

**LANDERHOLM**

Legal advisors. Trusted advocates.

805 Broadway Street
Suite 1000
PO Box 1086
Vancouver, WA 98666T: (360) 696-3312
T: (503) 283-3393
F: (360) 816-2521
www.landerholm.com**STATEMENT**DALE E. ANDERSON
[REDACTED]

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

PLEASE DETACH ABOVE AND RETURN WITH PAYMENT

RE: STATE FARM LITIGATION

FOR PROFESSIONAL SERVICES RENDERED

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
2/13/2019	BRADLEY W. ANDERSEN	0.60	216.00	MEET WITH ATTORNEY STOUMBOS TO DISCUSS PROCEEDING FORWARD WITH CLAIM AGAINST THE INSURANCE COMPANY ON BAD FAITH CLAIMS.
2/13/2019	ZACHARY H. STOUMBOS	1.10	385.00	ANALYZE BAD FAITH CLAIM AND COMMUNICATIONS WITH ATTORNEY.
2/14/2019	ZACHARY H. STOUMBOS	0.30	105.00	ASSEMBLE DOCUMENTS FOR ANALYSIS OF CLAIM.
2/28/2019	BRADLEY W. ANDERSEN	2.80	1,008.00	MEETING WITH ATTORNEY STOUMBOUS AND DALE ANDERSEN REGARDING STATUS OF CASE; DISCUSS STRATEGIES GOING FORWARD.
2/28/2019	ZACHARY H. STOUMBOS	1.50	525.00	CONFERENCE WITH DALE ANDERSON TO REVIEW CLAIM.
3/5/2019	BRADLEY W. ANDERSEN	0.30	108.00	ANALYZE ISSUES WITH A REVIEW OF THE POTENTIAL CLAIMS WITH PHIL HABERTHUR.
3/9/2019	BRADLEY W. ANDERSEN	2.20	792.00	ANALYZE CASE FOR DRAFTING AN ENGAGEMENT LETTER (.4); RESEARCH WASHINGTON LAW WITH REGARD TO TREBLE DAMAGES AND ATTORNEY'S FEES (1.5) ; DRAFT AND REVISE ENGAGEMENT LETTER FOR ZACH STOUMBOS' REVIEW (.3).
4/24/2019	BRADLEY W. ANDERSEN	0.50	180.00	REVIEW AND RESPOND TO E-MAIL FROM DALE REGARDING POTENTIAL CLAIMS AGAINST THE INSURANCE COMPANY FOR BAD FAITH CLAIMS HANDLING.
4/26/2019	CLAIRE L ROOTJES	0.50	147.50	REVIEW CORRESPONDENCE AND LEGAL AUTHORITY IN PREPARATION FOR DRAFTING DEMAND LETTER AND COMPLAINT.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/29/2019	CLAIRE L ROOTJES	0.30	88.50	COMMUNICATE WITH B. ANDERSON REGARDING LEGAL THEORIES AND FACTS OF CASE.
4/29/2019	ZACHARY H. STOUMBOS	1.10	385.00	REVIEW AND ANALYZE STATUTE OF LIMITATIONS FOR STATE FARM CLAIMS.
5/1/2019	CLAIRE L ROOTJES	0.90	265.50	BEGIN TO GATHER AND ANALYZE AUTHORITIES REGARDING STATUTES OF LIMITATIONS FOR INSURANCE CLAIMS IN WASHINGTON.
5/2/2019	CLAIRE L ROOTJES	2.30	678.50	GATHER AND ANALYZE AUTHORITIES REGARDING INSURANCE FAIR CONDUCT ACT AND WASHINGTON CPA IN ADVANCE OF DRAFTING DEMAND LETTER AND COMPLAINT.
5/3/2019	CLAIRE L ROOTJES	2.50	737.50	CONTINUE DRAFTING DEMAND LETTER (.4) AND BEGIN DRAFTING COMPLAINT (2.1).
5/8/2019	CLAIRE L ROOTJES	0.80	236.00	DRAFT COMPLAINT AGAINST STATE FARM.
5/9/2019	CLAIRE L ROOTJES	2.90	855.50	CONTINUE TO DRAFT COMPLAINT AND GATHER AUTHORITIES IN SUPPORT OF SAME.
5/10/2019	CLAIRE L ROOTJES	1.30	383.50	CONTINUE TO DRAFT AND REVISE COMPLAINT (.8) AND DEMAND LETTER TO STATE FARM (.5).
5/11/2019	ZACHARY H. STOUMBOS	0.50	175.00	REVIEW AND COMMENTS ON DRAFT DEMAND LETTER.
5/14/2019	CLAIRE L ROOTJES	1.40	413.00	REVIEW CORRESPONDENCE FROM STATE FARM (.4) AND REVISE DEMAND LETTER (1.1).
7/7/2019	BRADLEY W. ANDERSEN	2.80	1,008.00	CONTINUE TO REVIEW AND REVISE LETTER TO INSURANCE COMPANY.
7/7/2019	BRADLEY W. ANDERSEN	1.50	540.00	REVIEW DOCUMENTS RELATED TO THE DENIAL OF OUR CLAIM (.4) AND CONTINUE TO RESEARCH LAW WITH REGARD TO BAD FAITH BY INSURANCE COMPANIES (1.1).
7/9/2019	BRADLEY W. ANDERSEN	0.60	216.00	LONG TELEPHONE CONFERENCE WITH ATTORNEY BRAD SMITH WITH REGARD TO BAD FAITH CLAIMS.

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EXHIBIT A
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9/9/2019	BRADLEY W. ANDERSEN	1.50	540.00	RESEARCH EFFECT OF A MISSING INSURANCE POLICY AND BURDENS OF PROOF AT TRIAL.
9/9/2019	BRADLEY W. ANDERSEN	1.80	648.00	CONTINUE REVIEW OF INSURANCE POLICIES AND ANALYSIS REGARDING COVERAGE.
9/11/2019	BRADLEY W. ANDERSEN	1.00	360.00	MEET WITH ZACH TO ADVISE HIM OF ADDITIONAL AREAS OF INVESTIGATION (.1); RESEARCH THE ISSUE OF STATUTE OF LIMITATIONS (.4).
9/19/2019	BRADLEY W. ANDERSEN	0.50	180.00	LONG MEETING WITH ZACH TO GET INFORMATION TO PASS ONTO OUR INSURANCE ATTORNEY BRAD SMITH.
9/19/2019	ZACHARY H. STOUMBOS	0.40	140.00	ASSEMBLE DOCUMENTS FOR REVIEW REGARDING CLAIMS AGAINST STATE FARM.
9/20/2019	BRADLEY W. ANDERSEN	0.90	324.00	TELEPHONE CONFERENCE WITH THE INSURANCE ATTORNEY BRAD SMITH TO ANALYZE POTENTIAL CLAIMS AGAINST INSURER AND TO DISCUSS STRATEGIES FOR GOING FORWARD.
9/22/2019	BRADLEY W. ANDERSEN	1.50	540.00	CONTINUE TO DRAFT AND REVISE LETTER FOR ZACH, DALE AND BRAD'S REVIEW.
9/22/2019	BRADLEY W. ANDERSEN	1.50	540.00	CONTINUE TO RESEARCH CASES INVOLVING THE DUTIES OF AGENTS WITH REGARD TO REPRESENTATIONS ABOUT POLICY.
9/22/2019	BRADLEY W. ANDERSEN	0.80	288.00	CONTINUE TO REVIEW THE UNDERLYING POLICIES AND CONSIDER COMMENTS MADE BY BRAD SMITH.
9/23/2019	BRADLEY W. ANDERSEN	1.00	360.00	REVIEW AND ANALYZE MEDICAL REPORTS WITH REGARD TO THEORY OF INADEQUATE INVESTIGATION BY INSURER.
9/23/2019	BRADLEY W. ANDERSEN	1.00	360.00	CONTINUE TO WORK ON LETTER TO STATE FARM.
9/23/2019	ZACHARY H. STOUMBOS	0.50	175.00	REVIEW AND ANALYZE POTENTIAL CLAIMS AGAINST INSURER.

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9/24/2019	BRADLEY W. ANDERSEN	2.20	792.00	CONTINUE TO REVIEW AND REVISE LETTER, INCLUDING AN ANALYSIS REGARDING INADEQUATE INVESTIGATION BY CLAIMS ADJUSTER.
10/11/2019	ZACHARY H. STOUMBOS	0.50	175.00	REVIEW AND ANALYZE DRAFT LETTER TO STATE FARM.
10/14/2019	ZACHARY H. STOUMBOS	0.20	70.00	REVIEW AND RESPOND TO CORRESPONDENCE AND MEMORANDUM REGARDING LAW ON MISSING INSURANCE POLICIES.
10/23/2019	BRADLEY W. ANDERSEN	1.30	468.00	REVIEW MY DRAFT LETTER IN PREPARATION FOR MEETING WITH BRAD SMITH, ZACH STOUMBOS AND DALE WITH REGARD TO FINALIZING THE LETTER.
10/23/2019	ZACHARY H. STOUMBOS	1.20	420.00	TELEPHONE CONFERENCE REGARDING LETTER TO STATE FARM AND PROVIDE COMMENTS ON SAME.
10/25/2019	CURTIS J CHRISTENSEN	0.30	49.50	RESEARCH CONTACT INFORMATION FOR RETIRED ATTORNEY, PEGGY FORAKER AND LEAVE VOICEMAIL FOR MS. FORAKER FOR INTERVIEW.
11/1/2019	BRADLEY W. ANDERSEN	1.80	648.00	BEGIN TO REVIEW THE PROPOSED CHANGES TO MY DEMAND LETTER AND INCORPORATE THOSE CHANGES IN THE LETTER.
11/3/2019	BRADLEY W. ANDERSEN	3.20	1,152.00	CONTINUE TO DRAFT AND REVISE DEMAND LETTER TO STATE FARM FOR FINAL REVIEW BY BRAD SMITH AND DALE ANDERSON.
11/4/2019	BRADLEY W. ANDERSEN	1.00	360.00	REVIEW AND INCORPORATE BRAD SMITH CHANGES AND DALE'S CHANGES AND MAKE FINAL CHANGES TO THE DEMAND LETTER AND ARRANGE TO SEND OUT THE DEMAND WITH COPIES TO THE INSURANCE COMMISSIONER.
11/8/2019	CURTIS J CHRISTENSEN	0.20	33.00	TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING DOCUMENTS NEEDED FOR ANALYSIS.

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11/11/2019	AMANDA P BEATSON	1.60	208.00	CONDUCT REVIEW OF PHYSICAL FILES FOR CORRESPONDENCE FROM PREVIOUS COUNSEL, PEGGY FORAKER, AND ORIGINAL SETTLEMENT AGREEMENT.
11/11/2019	CURTIS J CHRISTENSEN	0.60	99.00	REVIEW ELECTRONIC FILE FOR DOCUMENTS REQUESTED BY PEGGY FORAKER; DISCUSSION WITH PARALEGAL, AMANDA BEATSON, REGARDING REVIEW OF PHYSICAL FILE AND LOCATING DOCUMENTS REQUESTED BY PEGGY FORAKER.
11/14/2019	CURTIS J CHRISTENSEN	0.40	66.00	FURTHER REVIEW OF FILE FOR DOCUMENTS TO PROVIDE TO PEGGY FORAKER, ATTORNEY (.3). PREPARE LINK TO DOCUMENTS AND E-MAIL PEGGY FORAKER REGARDING SAME (.1).
12/5/2019	CURTIS J CHRISTENSEN	0.20	33.00	FOLLOW-UP WITH PEGGY FORAKER, PREVIOUS ATTORNEY FOR TREJO, REGARDING DISCUSSION ABOUT CASE.
12/9/2019	CURTIS J CHRISTENSEN	0.20	33.00	DISCUSSION WITH ATTORNEY BRAD ANDERSEN REGARDING MEETING WITH ATTORNEY PEGGY FORAKER (.1); EXCHANGE E-MAILS WITH PEGGY FORAKER REGARDING MEETING (.1).
12/16/2019	BRADLEY W. ANDERSEN	0.80	288.00	REVIEW AND ANALYZE DENIAL LETTER FROM THE INSURANCE COMPANY AND FORWARD TO CLIENTS AND BRAD SMITH WITH GENERAL COMMENTS.
12/17/2019	ZACHARY H. STOUMBOS	0.30	105.00	REVIEW AND COMMENT ON STATE FARM'S DENIAL LETTER.
12/18/2019	BRADLEY W. ANDERSEN	0.30	108.00	REVIEW THE UNDERWRITING FILES AND FORWARD ONTO BRAD AND CLIENT WITH MY REVIEW AND COMMENTS REGARDING THE UNDERWRITER'S FILE.
12/18/2019	BRADLEY W. ANDERSEN	0.30	108.00	EXCHANGE OF VOICE MESSAGES WITH INSURANCE ADJUSTER STEVE MCALLISTER TO GET COPIES OF THE UNDERWRITING FILE.

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12/21/2019	BRADLEY W. ANDERSEN	0.30	108.00	REVIEW E-MAILS BETWEEN BRAD SMITH AND DALE WITH REGARD TO FACTUAL ALLEGATIONS IN COMPLAINT AGAINST STATE FARM.
1/2/2020	CURTIS J CHRISTENSEN	0.30	49.50	TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING MEETING WITH ATTORNEY (.2); E-MAIL PEGGY FORAKER TO CONFIRM MEETING (.1).
1/4/2020	BRADLEY W. ANDERSEN	1.50	555.00	REVIEW AND REVISE COMPLAINT FOR FINAL REVIEW AND FILING.
1/7/2020	BRADLEY W. ANDERSEN	0.30	111.00	EXCHANGE OF E-MAILS WITH BRAD SMITH WITH REGARD TO CHANGES TO THE COMPLAINT.
1/20/2020	CURTIS J CHRISTENSEN	0.30	54.00	TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING MEETING (.2); E-MAIL PEGGY FORAKER REGARDING NEW MEETING DATE AND TIME (.1).
1/28/2020	BRADLEY W. ANDERSEN	2.00	750.00	TRAVEL TO NORTHEAST PORTLAND AND INTERVIEW PEGGY FORAKER.
1/28/2020	BRADLEY W. ANDERSEN	0.70	262.50	REVIEW THE NOTES, E-MAILS AND OTHER DOCUMENTS IN PREPARATION FOR AN INTERVIEW OF TREJO'S ATTORNEY PEGGY FORAKER.
1/28/2020	CURTIS J CHRISTENSEN	1.10	198.00	MEET WITH ATTORNEY TO DISCUSS CASE (.2); REVIEW AND LOCATE REQUESTED FILE MATERIALS (.7); PREPARE DOCUMENTS FOR MEETING WITH PEGGY FORAKER (.2).
1/28/2020	MONICA M RECH	0.50	0.00	TRANSCRIBE TAPE OF INTERVIEW OF PEGGY FORAKER.
1/29/2020	BRADLEY W. ANDERSEN	0.50	187.50	PREPARE SUMMARY OF INTERVIEW WITH PEGGY FORAKER.
1/30/2020	MONICA M RECH	0.60	0.00	SCAN COPIES OF ALL EXPERT REPORTS INTO LITIGATION FILE.
1/30/2020	CURTIS J CHRISTENSEN	0.20	0.00	DISCUSSION WITH CLERK REGARDING DIGITIZING ALL FILES FOR LITIGATION.

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2/7/2020	BRADLEY W. ANDERSEN	1.50	555.00	MAKE FINAL CHANGES TO THE COMPLAINT.
2/11/2020	R. BRYCE SINNER	0.90	279.00	REVIEW AND FINAL EDITS TO COMPLAINT PRIOR TO FILING.
3/2/2020	CURTIS J CHRISTENSEN	0.20	36.00	REVIEW LITIGATION STATUS AND LOCAL COURT RULES FOR INITIAL DISCLOSURES (.1) AND E-MAIL TEAM REGARDING SAME (.1).
3/10/2020	ZACHARY H. STOUMBOS	0.10	35.00	ANALYZE ISSUES REGARDING MAGISTRATE JURISDICTION OVER CLAIMS AGAINST STATE FARM.
3/23/2020	AMANDA P BEATSON	0.90	117.00	DRAFT PLAINTIFFS' INITIAL DISCLOSURES.
3/23/2020	R. BRYCE SINNER	0.20	62.00	REVIEW COURT'S SCHEDULING ORDERS.
3/24/2020	AMANDA P BEATSON	0.60	78.00	CONTINUE TO DRAFT PLAINTIFF'S INITIAL DISCLOSURES.
3/24/2020	CURTIS J CHRISTENSEN	0.20	36.00	REVIEW VARIOUS COURT DEADLINES (.1) AND TELEPHONE CONFERENCE WITH AMANDA BEATSON REGARDING WITNESS LIST ON INITIAL DISCLOSURES (.1).
3/30/2020	CURTIS J CHRISTENSEN	0.50	90.00	REVISE INITIAL DISCLOSURES FOR ATTORNEY REVIEW.
4/1/2020	BRADLEY W. ANDERSEN	0.60	222.00	PREPARE FOR AND ATTEND THE PRETRIAL CONFERENCE.
4/1/2020	BRADLEY W. ANDERSEN	0.70	259.00	DRAFT AND REVISE THE PRETRIAL ORDER.
4/6/2020	CURTIS J CHRISTENSEN	0.20	36.00	DISCUSSION WITH ATTORNEY REGARDING CASE DEADLINES AND STATUS OF DRAFT INITIAL DISCLOSURES.
4/9/2020	CURTIS J CHRISTENSEN	2.10	378.00	REVIEW AND REVISE INITIAL DISCLOSURES.
4/23/2020	R. BRYCE SINNER	0.80	248.00	BEGIN REVIEWING AND EDITING INITIAL DISCLOSURES (.5); REVIEW COMPLAINT TO IDENTIFY RELEVANT WITNESSES AND FACTS (.3).

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4/24/2020	CURTIS J CHRISTENSEN	0.50	90.00	TELEPHONE CONFERENCE WITH BRYCE SINER REGARDING DRAFT INITIAL DISCLOSURES AND FINALIZING SAME.
4/24/2020	R. BRYCE SINER	1.30	403.00	FINISH REVIEWING INITIAL DISCLOSURES.
4/24/2020	R. BRYCE SINER	0.40	124.00	FURTHER CORRESPONDENCE WITH BRAD SMITH AND FINAL CHANGES TO INITIAL DISCLOSURES.
4/24/2020	R. BRYCE SINER	0.40	124.00	REVIEW BRAD SMITH'S COMMENTS ON INITIAL DISCLOSURES (.1); MAKE CHANGES AND FORWARD TO BRAD (.3).
4/27/2020	BRADLEY W. ANDERSEN	0.40	148.00	RESEARCH REGARDING CASE LAW ON DUTIES TO "FIRST PARTY INSUREDS" FOR PURPOSES OF TREBLE DAMAGES.
4/27/2020	BRADLEY W. ANDERSEN	0.50	185.00	REVIEW AND REVISE THE INITIAL DISCLOSURES.
4/28/2020	CURTIS J CHRISTENSEN	0.70	126.00	DRAFT FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT (.5); INVESTIGATE CAROL FUNK CONTACT INFORMATION (.2).
4/30/2020	CURTIS J CHRISTENSEN	0.30	54.00	REVIEW JOINT STATUS REPORT (.2) AND SUBMIT COMMENTS REGARDING DISCOVERY PLAN (.1).
5/21/2020	CURTIS J CHRISTENSEN	0.10	18.00	RESPOND TO E-MAIL FROM ATTORNEY BRYCE SINER REGARDING DISCOVERY STATUS.
6/15/2020	CURTIS J CHRISTENSEN	0.50	90.00	DRAFT DISCOVERY RESPONSES (.4); E-MAIL CLIENT REGARDING RESPONSES TO SAME (.1).
6/26/2020	CURTIS J CHRISTENSEN	0.30	54.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING DISCOVERY (.2); E-MAIL ATTORNEYS REGARDING RESPONDING TO DISCOVERY (.1).
6/29/2020	CURTIS J CHRISTENSEN	0.20	36.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING DISCOVERY MEETING (.1); E-MAIL ATTORNEY REGARDING MEETING WITH CLIENT (.1).

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7/1/2020	CURTIS J CHRISTENSEN	0.20	0.00	EXCHANGE E-MAILS WITH FIRM ADMINISTRATOR REGARDING CLIENT MEETING (.1); RESPOND TO ATTORNEY REGARDING POTENTIAL ALTERNATIVES IN LIGHT OF PANDEMIC RESTRICTIONS (.1).
7/6/2020	BRADLEY W. ANDERSEN	0.40	148.00	MEET WITH ZACH AND CURTIS TO BEGIN TO COMPILE RELEVANT POLICY DOCUMENTS.
7/6/2020	CURTIS J CHRISTENSEN	0.20	36.00	CONTACT FARMERS INSURANCE REGARDING POLICY RELATED TO ALLWOOD APARTMENTS (.1); TELEPHONE CONFERENCE WITH AARON HOROWITZ (.1).
7/6/2020	CURTIS J CHRISTENSEN	0.80	144.00	TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING DISCOVERY REQUESTS (.5); TELEPHONE CONFERENCE WITH CLIENT REGARDING INSURANCE POLICIES (.3).
7/6/2020	ZACHARY H. STOUMBOS	1.00	350.00	REVIEW AND ANALYZE DISCOVERY REQUESTS (.8); REVIEW ISSUE REGARDING CANCELATION BY STATE FARM (.2).
7/7/2020	CURTIS J CHRISTENSEN	0.30	54.00	TELEPHONE CONFERENCE WITH BROWN & BROWN INSURANCE COMPANY REGARDING RECORDS REQUEST (.2); TELEPHONE CONFERENCE WITH CLIENT REGARDING SAME (.1).
7/8/2020	BRADLEY W. ANDERSEN	1.20	444.00	BEGIN TO DRAFT ANSWERS TO THE DEFENDANT'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.
7/8/2020	BRADLEY W. ANDERSEN	0.40	148.00	TELEPHONE CONFERENCE WITH INSURANCE AGENT AT FARMERS, AARON HOROWITZ, REGARDING COVERAGE ISSUES.
7/8/2020	CURTIS J CHRISTENSEN	1.10	198.00	REVIEW DOCUMENTS FROM AARON HOROWITZ (.3); FOLLOW-UP WITH AARON HOROWITZ REGARDING CLARIFICATION OF INSURANCE POLICIES AND REQUEST FOR CONFERENCE WITH ATTORNEY BRAD ANDERSEN (.4); TELEPHONE CONFERENCE WITH BRAD ANDERSEN AND AARON

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				HOROWITZ REGARDING POLICIES AND CASE FACTS (.4).
7/10/2020	BRADLEY W. ANDERSEN	2.00	740.00	LONG MEETING WITH DALE AND ZACH TO GO OVER OUR RESPONSES TO THEIR DISCOVERY REQUEST AND ALSO TO DETERMINE THE HISTORY OF THE ANDERSON'S INSURANCE POLICIES.
7/10/2020	BRADLEY W. ANDERSEN	2.00	740.00	CONTINUE TO DRAFT AND REVISE RESPONSES TO THE DISCOVERY REQUEST.
7/10/2020	CURTIS J CHRISTENSEN	1.00	180.00	ZOOM CONFERENCE CALL WITH CLIENT AND ATTORNEYS REGARDING PRIOR INSURANCE POLICIES (.4); DISCUSSION WITH CLIENT REGARDING HISTORY OF INSURANCE POLICIES (.2); MULTIPLE CONFERENCE CALLS WITH ATTORNEYS REGARDING DISCOVERY RESPONSES (.2); E-MAIL OPPOSING COUNSEL REGARDING REQUEST FOR EXTENSION OF DISCOVERY RESPONSES (.2).
7/10/2020	ZACHARY H. STOUMBOS	1.60	560.00	ZOOM CONFERENCE WITH DALE REGARDING DISCOVERY RESPONSES.
7/12/2020	BRADLEY W. ANDERSEN	1.90	703.00	DRAFT AND REVISE FIRST SET OF DISCOVERY REQUESTS.
7/13/2020	CURTIS J CHRISTENSEN	0.30	54.00	MULTIPLE TELEPHONE CONFERENCES WITH CLIENT REGARDING DOCUMENTS RELATED TO PRIOR INSURANCE POLICIES (.2); COMMUNICATE WITH OFFICE STAFF REGARDING PREPARATION OF MATERIALS (.1).
7/14/2020	BRADLEY W. ANDERSEN	0.40	148.00	TELEPHONE CONFERENCE WITH ZACH REGARDING DISCOVERY REQUESTS.
7/14/2020	CURTIS J CHRISTENSEN	0.60	108.00	DISCUSSION WITH ATTORNEY REGARDING DISCOVERY RESPONSES AND JOINDER OF ADDITIONAL PARTIES TO CLAIMS AGAINST STATE FARM (.4); CORRESPONDENCE REGARDING SAME (.2).

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
7/14/2020	ZACHARY H. STOUMBOS	0.40	140.00	COMMUNICATIONS WITH DALE AND WORK ON DISCOVERY TO INCLUDE AGENT'S FILES.
7/15/2020	CURTIS J CHRISTENSEN	0.50	0.00	WORK WITH ASSISTANT TO FINALIZE DISCOVERY TO DEFENDANTS.
7/20/2020	CURTIS J CHRISTENSEN	0.80	144.00	TELEPHONE CONFERENCE WITH JOY PROBY OF BROWN AND BROWN INSURANCE COMPANY REGARDING PRIOR POLICIES (.4); E-MAILS REGARDING SAME (1); REVIEW AND RESPOND TO CLIENT'S E-MAIL REGARDING STATUS OF INSURANCE RESEARCH (.3).
7/21/2020	CURTIS J CHRISTENSEN	0.20	36.00	REVIEW E-MAIL FROM BROWN AND BROWN INSURANCE (.1) AND CONTACT JAMIE TIDD WITH MUTUAL OF ENUMCLAW REGARDING CLIENT POLICIES (.1).
7/21/2020	CURTIS J CHRISTENSEN	0.40	72.00	CONTACT LIBERTY MUTUAL AGENT TROY BURKS REGARDING CLIENT POLICES WITH NIES INSURANCE (.2); E-MAIL TEAM REGARDING CONVERSATION AND POTENTIAL NEXT STEPS (.2).
7/24/2020	CURTIS J CHRISTENSEN	1.50	270.00	REVIEW DRAFT DISCOVERY RESPONSES AND CLEAN UP SAME; FOLLOW-UP WITH AARON HOROWITZ REGARDING COPIES OF POLICIES (1.3); REVIEW RESPONSIVE DOCUMENTS AND BEGIN DESIGNATING PRODUCTION SET (.2).
7/27/2020	BRADLEY W. ANDERSEN	0.80	296.00	CONTINUE TO REVIEW AND REVISE DISCOVERY RESPONSES (.6); INCLUDING TELEPHONE CONFERENCE WITH DALE AND CURTIS (.2).
7/27/2020	CURTIS J CHRISTENSEN	1.20	216.00	CONTINUE REVIEWING DOCUMENTS FOR PRIVILEGE AND RESPONSIVENESS (.6); E-MAIL ATTORNEYS REGARDING COVERAGE ISSUES AT TIME OF TREJO INCIDENT (.4); TELEPHONE CONFERENCE WITH ATTORNEY REGARDING CLIENT INSURANCE POLICY TIMELINE (.2).
7/27/2020	CURTIS J CHRISTENSEN	0.60	108.00	REVIEW RESPONSES TO WRITTEN DISCOVERY (.2); E-MAIL ATTORNEYS REGARDING PROPOSED

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INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				CHANGES TO SAME (.2); E-MAIL CLIENT REGARDING FINAL REVIEW AND VERIFICATION OF DISCOVERY RESPONSES (.2).
7/27/2020	CURTIS J CHRISTENSEN	0.30	54.00	ATTEMPT FOLLOW-UP CALL WITH MUTUAL OF ENUMCLAW REGARDING COPIES OF OLD INSURANCE POLICIES (.2); E-MAIL JAMIE TIDD, MUTUAL OF ENUMCLAW, REGARDING SAME (.1).
7/28/2020	BRADLEY W. ANDERSEN	0.40	148.00	TELEPHONE CONFERENCE WITH DALE WITH REGARD TO RESPONSES TO DISCOVERY AND TO MAKE CHANGES.
7/28/2020	CURTIS J CHRISTENSEN	0.80	144.00	MEET WITH ATTORNEY REGARDING WRITTEN RESPONSES TO DISCOVERY (.6); MULTIPLE PHONE CONFERENCES WITH CLIENT REGARDING WRITTEN RESPONSES AND CHANGES TO SAME (.2).
7/28/2020	CURTIS J CHRISTENSEN	2.10	378.00	CONTINUE REVIEWING DOCUMENTS FOR RESPONSIVENESS AND PRIVILEGE AND E-MAIL ATTORNEYS AND CLIENT REGARDING QUESTIONS ABOUT SPECIFIC DOCUMENTS.
7/28/2020	CURTIS J CHRISTENSEN	0.20	0.00	EXCHANGE E-MAILS WITH CLERK REGARDING FILES PROVIDED BY CLIENT.
7/29/2020	BRADLEY W. ANDERSEN	0.50	185.00	FINALIZE RESPONSES TO INCORPORATE DALE AND ZACH'S COMMENTS.
7/29/2020	CURTIS J CHRISTENSEN	0.20	36.00	DISCUSSION WITH ATTORNEY AND CLIENT REGARDING AMENDED DISCOVERY RESPONSES.
7/29/2020	CURTIS J CHRISTENSEN	0.10	18.00	REVIEW AND RESPOND TO JAMIE TIDD WITH MUTUAL OF ENUMCLAW INSURANCE REGARDING COPIES OF PRIOR INSURANCE POLICIES.
7/30/2020	CURTIS J CHRISTENSEN	0.50	90.00	TELEPHONE CONFERENCE WITH CLIENT REGARDING FINAL REVISIONS TO RESPONSES (.3); DISCUSSION WITH ATTORNEY REGARDING SAME (.1); MAKE REVISIONS AND E-MAIL CLIENT FINAL VERSION FOR REVIEW AND SIGNATURE (.1).

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
7/30/2020	CURTIS J CHRISTENSEN	0.20	36.00	EXCHANGE MULTIPLE E-MAILS WITH MUTUAL OF ENUMCLAW TO OBTAIN COPIES OF CLIENT POLICIES.
7/31/2020	CURTIS J CHRISTENSEN	0.30	54.00	CONTINUE REVIEW OF CLIENT FILES AND IDENTIFYING RESPONSIVE DOCUMENTS FOR PRODUCTION.
8/3/2020	CURTIS J CHRISTENSEN	1.30	234.00	CONTINUE REVIEWING DOCUMENTS FOR RESPONSIVENESS AND REMOVE DUPLICATE FILES (.9); E-MAIL OPPOSING COUNSEL WRITTEN RESPONSES TO DISCOVERY (.4).
8/4/2020	CURTIS J CHRISTENSEN	0.10	18.00	FOLLOW-UP WITH MUTUAL OF ENUMCLAW REGARDING LACK OF RESPONSE TO REQUEST FOR DOCUMENTS.
8/13/2020	CURTIS J CHRISTENSEN	0.10	18.00	REVIEW AND RESPOND TO OPPOSING COUNSEL'S E-MAIL REGARDING DISCOVERY.
8/18/2020	CURTIS J CHRISTENSEN	0.10	18.00	FOLLOW-UP WITH FARMER'S INSURANCE AGENT REGARDING STATUS OF FILE REQUEST.
8/31/2020	CURTIS J CHRISTENSEN	0.20	36.00	DISCUSSION WITH ASSISTANT AND ATTORNEY REGARDING NEXT STEPS (.1); RESPOND TO OPPOSING COUNSEL REGARDING REQUEST FOR ADDITIONAL TIME TO RESPOND TO DISCOVERY (.1).
9/14/2020	CURTIS J CHRISTENSEN	0.20	36.00	FOLLOW-UP WITH OPPOSING COUNSEL REGARDING DISCOVERY RESPONSES AND DOCUMENT PRODUCTION.
9/22/2020	BRADLEY W. ANDERSEN	0.80	296.00	REVIEW AND ANALYZE STATE FARM'S RESPONSES TO OUR DISCOVERY REQUEST.
9/22/2020	BRADLEY W. ANDERSEN	1.20	444.00	LONG TELEPHONE CONFERENCE WITH BRAD AND ZACH WITH REGARD TO STATE FARM'S RESPONSES AND OUR FOLLOW-UP WITH ADDITIONAL INFORMATION REQUESTS.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
9/22/2020	BRADLEY W. ANDERSEN	0.30	111.00	EMAIL PARALEGAL REGARDING POLICIES REFERRED TO BY STATE FARM IN THEIR DISCOVERY RESPONSES.
9/22/2020	CURTIS J CHRISTENSEN	0.40	72.00	E-MAIL OPPOSING COUNSEL REGARDING FAILURE TO PRODUCE DOCUMENTS (.2); DISCUSSION WITH BRAD ANDERSEN REGARDING NEXT STEPS (.1); E-MAIL BRAD SMITH COPY OF FORM CHRONOLOGY FOR CASE DEVELOPMENT (.1).
9/22/2020	ZACHARY H. STOUMBOS	0.80	280.00	CONFERENCE CALL WITH ATTORNEYS TO REVIEW DISCOVERY RESPONSES OF STATE FARM.
9/23/2020	BRADLEY W. ANDERSEN	0.40	148.00	CONTINUE TO REVIEW STATE FARM DISCOVERY RESPONSES AND ANALYZE COVERAGE ISSUES.
9/23/2020	CURTIS J CHRISTENSEN	0.30	54.00	TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING POLICY IDENTIFIED BY OPPOSING COUNSEL.
9/24/2020	CURTIS J CHRISTENSEN	0.20	36.00	E-MAIL CLIENT REGARDING DISCOVERY RESPONSES FROM STATE FARM AND CLARIFICATION OF NEW POLICY NUMBER REFERENCED IN INSURER'S RESPONSES.
10/7/2020	CURTIS J CHRISTENSEN	1.10	198.00	REVIEW STATE FARM'S DISCOVERY RESPONSES (.5); REVIEW CLIENT'S DOCUMENTS PROVIDED RELATED TO ALL INSURANCE POLICIES (.3); TELEPHONE CONFERENCE WITH CLIENT REGARDING STATE FARM'S RESPONSES; E-MAIL TEAM REGARDING POLICY IDENTIFIED IN STATE FARM'S RESPONSES (.3).
10/8/2020	CURTIS J CHRISTENSEN	0.30	54.00	TELEPHONE CONFERENCE WITH ATTORNEY REGARDING DIFFERENT POLICIES WITH STATE FARM AT TIME OF INCIDENT.
11/10/2020	CURTIS J CHRISTENSEN	0.20	36.00	DISCUSSION WITH ASSISTANT REGARDING STATUS OF MATTER (.1); REVIEW PROPOSED STIPULATED PROTECTION ORDER (.1).

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
11/19/2020	CURTIS J CHRISTENSEN	0.20	36.00	TELEPHONE CONFERENCE WITH BRAD SMITH REGARDING DISCOVERY STATUS.
11/24/2020	BRADLEY W. ANDERSEN	0.40	148.00	TELEPHONE CONFERENCE WITH POTENTIAL EXPERTS.
11/24/2020	BRADLEY W. ANDERSEN	1.30	481.00	REVIEW THE CHRONOLOGY PROVIDED BY BRAD SMITH IN PREPARATION FOR TELEPHONE CONFERENCE WITH BRAD.
11/24/2020	BRADLEY W. ANDERSEN	1.00	370.00	TELEPHONE CONFERENCE WITH BRAD SMITH TO DISCUSS HIS FINDINGS WITH REGARD TO THE CLAIMS' FILE.
11/24/2020	CURTIS J CHRISTENSEN	1.40	252.00	TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING STATUS OF DISCOVERY AND NEXT STEPS IN MATTER.
11/25/2020	BRADLEY W. ANDERSEN	5.00	1,850.00	BEGIN TO REVIEW AND COMPILE AS HOT DOCUMENTS THE DISCOVERY PROVIDED BY THE INSURANCE COMPANY, INCLUDING KEY WITNESSES AND CHRONOLOGY.
11/29/2020	BRADLEY W. ANDERSEN	5.00	1,850.00	CONTINUE TO REVIEW THE DISCOVERY PROVIDED BY INSURANCE COMPANY, INCLUDING WORKING ON THE CHRONOLOGY AND LIST OF WITNESSES.
12/4/2020	NICHOLAS F CODY	0.30	75.00	REVIEW PROPOSED STIPULATED PROTECTIVE ORDER.
12/16/2020	BRADLEY W. ANDERSEN	1.20	444.00	LONG TELEPHONE CONFERENCE WITH DALE, ZACH AND BRAD SMITH WITH REGARD TO DISCOVERY ANALYSIS REGARDING MERITS OF CLAIM AGAINST STATE FARM, AND DISCUSS NEXT STEPS GOING FORWARD ON DISCOVERY.
12/16/2020	NICHOLAS F CODY	1.60	400.00	TELEPHONE CONFERENCE WITH CLIENT AND ATTORNEYS ANDERSEN, STOUMBOS, AND SMITH REGARDING LITIGATION AGAINST STATE FARM, ANALYSIS OF DOCUMENTS PRODUCED IN DISCOVERY, POTENTIAL DEPONENTS, CASE STRATEGY/THEMES/THEORIES, AND NEXT STEPS.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
12/16/2020	ZACHARY H. STOUMBOS	1.20	420.00	TELEPHONE CONFERENCE REGARDING DISCOVERY AND LITIGATION STRATEGY.
12/29/2020	BRADLEY W. ANDERSEN	0.40	148.00	EXCHANGE OF EMAILS WITH BRAD SMITH WITH REGARD TO THE EXPERT, AND FOLLOW-UP WITH ZACH STOUMBOS.
12/29/2020	CURTIS J CHRISTENSEN	0.20	36.00	TELEPHONE CONFERENCE WITH ATTORNEY REGARDING EXPERT AND UMBRELLA POLICY (.1); E-MAIL ATTORNEYS UMBRELLA POLICY (.1).
12/29/2020	ZACHARY H. STOUMBOS	0.40	140.00	REVIEW AND APPROVE PROPOSED EXPERT.
12/31/2020	BRADLEY W. ANDERSEN	1.00	370.00	TELEPHONE CONFERENCE WITH THE DEFENDANT'S ATTORNEY WITH REGARD TO EXTENDING DEADLINE FOR EXPERT DISCOVERY AND DRAFT AND REVISE A STIPULATED MOTION AND ORDER REGARDING THE SAME.
12/31/2020	CURTIS J CHRISTENSEN	0.40	72.00	DISCUSSION WITH ATTORNEYS REGARDING APPROACHING DEADLINES AND ADJUSTING SAME; DISCUSSION REGARDING EXPERT FILE.
1/5/2021	CURTIS J CHRISTENSEN	1.70	306.00	REVIEW FILE MATERIALS AND EXCHANGE E-MAILS WITH CO-COUNSEL REGARDING FILES TO SEND TO EXPERT (1.1); ASSEMBLE EXPERT FILE (.4); SEND E-MAIL TO EXPERT WITH LINK TO FILES FOR REVIEW (.2).
1/5/2021	CURTIS J CHRISTENSEN	0.80	144.00	REVIEW FILE MATERIALS AND BEGIN ASSEMBLING FILE FOR EXPERT REVIEW; E-MAIL BRAD SMITH REGARDING SAME.
1/12/2021	ZACHARY H. STOUMBOS	2.00	700.00	PREPARE OUTLINE OF CASE AND ARGUMENTS RELATING TO LIABILITY POLICY AND LOSS OF DECLARATIONS PAGE.
1/20/2021	CURTIS J CHRISTENSEN	0.30	54.00	MULTIPLE COMMUNICATIONS WITH ATTORNEYS REGARDING MEETING WITH EXPERT TO DISCUSS PROGRESS OF REPORT.
1/22/2021	BRADLEY W. ANDERSEN	1.30	481.00	LONG TELEPHONE CONFERENCE AND INTERVIEW OF OUR EXPERTS.

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DALE E. ANDERSON

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
1/22/2021	CURTIS J CHRISTENSEN	2.20	396.00	TELEPHONE CONFERENCE WITH EXPERT AND ATTORNEYS REGARDING REPORT STATUS AND ITEMS NEEDED TO FINALIZE SAME (1.3); LOCATE MULTIPLE DOCUMENTS TO SEND TO EXPERT (.9).
1/22/2021	NICHOLAS F CODY	0.20	52.00	ATTEND PORTION OF CONFERENCE CALL WITH ATTORNEYS ANDERSEN AND SMITH AND EXPERT INSURANCE WITNESS.
1/26/2021	CURTIS J CHRISTENSEN	2.50	450.00	REVIEW FILE TO LOCATE DOCUMENTS FOR EXPERT (1.9); DISCUSSION WITH ATTORNEY REGARDING SAME (.3); E-MAIL EXPERT REGARDING REFERENCE TO DR. ZINSMEISTER REPORT (.3).
1/29/2021	BRADLEY W. ANDERSEN	1.00	385.00	BEGIN TO DRAFT FRCP 37(A) LETTER.
1/29/2021	CURTIS J CHRISTENSEN	0.50	92.50	REVIEW PRELIMINARY EXPERT REPORT.
1/29/2021	CURTIS J CHRISTENSEN	1.50	277.50	REVISE DISCOVERY LETTER TO OPPOSING COUNSEL (.7); REVIEW PRIVILEGE LOG AND DOCUMENT PRODUCTION (.5); TELEPHONE CONFERENCE WITH ATTORNEY REGARDING SAME (.3).
1/29/2021	CURTIS J CHRISTENSEN	0.40	74.00	DRAFT FRCP 30(B)(6) NOTICE OF DEPOSITION OF STATE FARM.
1/31/2021	BRADLEY W. ANDERSEN	0.80	308.00	DRAFT AND REVISE OUR LETTER WITH REGARD TO STATE FARM'S FAILURE TO ADEQUATELY RESPOND TO SETTLEMENT.
2/1/2021	BRADLEY W. ANDERSEN	1.80	693.00	REVIEW AND COMMENT ON EXPERT'S REPORT.
2/1/2021	BRADLEY W. ANDERSEN	0.70	269.50	DRAFT AND FINALIZE THE LETTER REGARDING ADDITIONAL DISCOVERY WE NEED OPPOSING TO PROVIDE, FRCP 30(B)(6), EXPERT REPORT AND THE STIPULATED PROTECTIVE ORDER.
2/1/2021	BRADLEY W. ANDERSEN	0.80	308.00	DRAFT AND REVISE FRCP 30(B)(6) DEPOSITION NOTICE.

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STATEMENT

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
2/1/2021	CURTIS J CHRISTENSEN	1.40	259.00	MULTIPLE CONVERSATIONS WITH ATTORNEY REGARDING FRCP 30(B)(6), LETTER TO OPPOSING COUNSEL AND EXPERT REPORT FINALIZATION (.7); FINALIZE LETTER AND ATTACHMENTS AND EXECUTE SERVICE OF SAME (.7).
2/26/2021	CURTIS J CHRISTENSEN	0.20	37.00	CONTACT OPPOSING COUNSEL REGARDING STATUS OF REPLY TO OUR FEBRUARY 1 LETTER AND REGARDING DEPOSITION DATES.
3/17/2021	CURTIS J CHRISTENSEN	0.30	55.50	REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING EXPERT REPORT (.2); TELEPHONE CONFERENCE WITH ASSISTANT REGARDING SAME; EXCHANGE E-MAILS WITH CO-COUNSEL REGARDING EXPERT REPORTS (.1).
3/23/2021	CURTIS J CHRISTENSEN	0.40	74.00	DRAFT FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT.
3/24/2021	CURTIS J CHRISTENSEN	0.20	37.00	FOLLOW-UP WITH OPPOSING COUNSEL REGARDING RESPONSE TO FEBRUARY DISCOVERY LETTER (.1); E-MAIL CLIENT REGARDING DEPOSITION DATES (.1).
3/30/2021	CURTIS J CHRISTENSEN	0.70	129.50	TELEPHONE CONFERENCE WITH ATTORNEY REGARDING DEPOSITIONS AND DISCOVERY STATUS (.4); TELEPHONE CONFERENCE WITH ASSISTANT REGARDING SAME (.2); CONTACT PEGGY FORAKER REGARDING DEPOSITION AND E-MAIL ATTORNEYS REGARDING SAME (.1).
4/5/2021	BRADLEY W. ANDERSEN	0.60	231.00	REVIEW AND ANALYZE STATE FARM'S EXPERT WITNESS REPORT.
4/5/2021	BRADLEY W. ANDERSEN	0.40	154.00	MEET WITH BRAD AND CURTIS TO PREPARE FOR DISCOVERY MEET AND CONFER.
4/5/2021	CURTIS J CHRISTENSEN	1.00	185.00	TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING NEXT STEPS IN CASE.
4/6/2021	BRADLEY W. ANDERSEN	2.20	847.00	PREPARE FOR AND CONDUCT THE FRCP 26(I) CONFERENCE WITH OPPOSING COUNSEL,

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				SETTING UP DEPOSITIONS, AND DISCUSSING THE EXPERTS REPORTS.
4/6/2021	CURTIS J CHRISTENSEN	3.00	555.00	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING DISCOVERY ISSUES (2.2); E-MAIL ATTORNEYS REGARDING SUMMARY OF DISCOVERY ISSUES (.4); RESPOND TO OPPOSING COUNSEL REGARDING STIPULATED PROTECTION ORDER (.2); CONTACT CLIENT AND EXPERT WITNESS REGARDING AVAILABILITY FOR DEPOSITIONS (.2).
4/7/2021	CURTIS J CHRISTENSEN	0.20	37.00	DISCUSSION WITH ATTORNEY REGARDING SUPPLEMENTING DOCUMENT PRODUCTION WITH ADDITIONAL INSURANCE INFORMATION FROM CLIENT.
4/15/2021	CURTIS J CHRISTENSEN	0.40	74.00	TELEPHONE CONFERENCE WITH HELLER WEIGENSTEIN REGARDING DOCUMENTS SOUGHT FROM PLAINTIFF'S PERSONAL INJURY CASE.
4/15/2021	CURTIS J CHRISTENSEN	1.20	222.00	PREPARE SUPPLEMENTAL DOCUMENT PRODUCTION AND REVIEW SAME (.8); E-MAIL OPPOSING COUNSEL SUPPLEMENTAL PRODUCTION AND FOLLOW-UP REGARDING MULTIPLE DISCOVERY ISSUES (.4).
4/16/2021	CURTIS J CHRISTENSEN	0.50	92.50	TELEPHONE CONFERENCE WITH ELISA SMITH AT HELLER WEIGENSTEIN REGARDING REQUEST FOR FILES (.3); TELEPHONE CONFERENCE WITH CLIENT REGARDING SAME (.1); E-MAIL HELLER WEIGENSTEIN FILE REQUEST (.1).
4/16/2021	CURTIS J CHRISTENSEN	0.30	0.00	REVIEW EXPERT INVOICES AND E-MAIL CLIENT REGARDING SAME.
4/19/2021	CURTIS J CHRISTENSEN	1.00	0.00	REVIEW RECORDS RECEIVED AND E-MAIL TRIAL TEAM REGARDING FINDINGS.
5/5/2021	CURTIS J CHRISTENSEN	0.30	55.50	TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING DEPOSITION.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/5/2021	CURTIS J CHRISTENSEN	0.20	37.00	REVIEW STATUS OF DEFENDANTS DISCOVERY AND FOLLOW-UP WITH OPPOSING COUNSEL REGARDING SAME.
5/10/2021	CURTIS J CHRISTENSEN	0.80	148.00	SEARCH PUBLIC RECORDS TO LOCATE TARA TREJO (.4); CONTACT TARA TREJO AND INTERVIEW HER REGARDING HER KNOWLEDGE OF STATE FARM'S INVESTIGATION (.2); E-MAIL ATTORNEY REGARDING SAME (.2).
5/11/2021	CURTIS J CHRISTENSEN	0.20	37.00	E-MAIL EXPERT REGARDING 1998 ZINSMEISTER OPINION OF CHILD CONDITION.
5/11/2021	CURTIS J CHRISTENSEN	0.70	129.50	DRAFT NOTICES OF DEPOSITION (.5); E-MAIL ATTORNEYS AND CLIENT REGARDING DEPOSITIONS AND INTERVIEW OF TARA TREJO (.2).
5/18/2021	BRADLEY W. ANDERSEN	0.40	154.00	REVIEW THE COURTS REJECTION OF THE PROTECTION ORDER AND FOLLOW UP CONVERSATION WITH OPPOSING COUNSEL REGARDING SAME.
5/18/2021	CURTIS J CHRISTENSEN	1.20	222.00	EXCHANGE MULTIPLE E-MAILS WITH ATTORNEY REGARDING DEPOSITIONS AND PROTECTION ORDER (.4); DRAFT LETTER TO OPPOSING COUNSEL REGARDING DEPOSITIONS AND PROTECTION ORDER (.4); FINALIZE DEPOSITION NOTICES (.2); TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING DEPOSITION (.2).
5/21/2021	CURTIS J CHRISTENSEN	0.10	18.50	E-MAIL CLIENT REGARDING DEPOSITIONS.
6/2/2021	CURTIS J CHRISTENSEN	0.40	74.00	DISCUSSION WITH ATTORNEY REGARDING DEPOSITION SCHEDULE IN JUNE AND PREPARATION FOR SAME (.2); CONTACT ATTORNEY FOR TREJO FAMILY, STEPHEN HENDRICKS, REGARDING INTERVIEWING TREJO FAMILY (.2).

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
6/3/2021	CURTIS J CHRISTENSEN	0.30	55.50	EXCHANGE E-MAILS WITH OPPOSING COUNSEL, ATTORNEYS AND EXPERT REGARDING DEPOSITION AVAILABILITY.
6/3/2021	CURTIS J CHRISTENSEN	0.90	166.50	TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING DEPOSITION LOGISTICS (.3); E-MAIL PEGGY FORAKER CONFIRMING DETAILS OF DEPOSITION (.2); TELEPHONE CONFERENCE WITH MULTIPLE VIRGINIA COURT REPORTERS REGARDING AVAILABILITY AND DETAILS (.1); E-MAIL FINAL COURT REPORTER ALL DEPOSITION INFORMATION (.1).
6/4/2021	CURTIS J CHRISTENSEN	0.40	74.00	CONTACT COURT REPORTER REGARDING DEPOSITIONS IN JUNE (.2); E-MAIL COURT REPORTER ALL DEPOSITION NOTICES AND INFORMATION FOR ALL PARTIES (.2).
6/4/2021	CURTIS J CHRISTENSEN	1.50	277.50	RESEARCH CAROL FUNK LOCATION FOR SERVICE OF DEPOSITION SUBPOENA (.4); EXCHANGE MULTIPLE E-MAILS WITH OPPOSING COUNSEL REGARDING SAME (.4); DRAFT COVER LETTER ENCLOSING SUBPOENA AND NOTICE OF DEPOSITION (.2); DRAFT SUBPOENA FOR DEPOSITION (.2); FOLLOW UP WITH OPPOSING COUNSEL REGARDING STATUS OF SUPPLEMENTAL DOCUMENT PRODUCTION (.3).
6/7/2021	CURTIS J CHRISTENSEN	0.20	0.00	EXCHANGE E-MAILS WITH COURT REPORTER AND UPDATE ZOOM INFORMATION FOR DEPOSITION OF PEGGY FORAKER.
6/8/2021	CURTIS J CHRISTENSEN	0.50	92.50	MULTIPLE COMMUNICATIONS WITH OPPOSING COUNSEL REGARDING DEPOSITIONS AND DISCOVERY (.3); EXCHANGE MULTIPLE COMMUNICATIONS WITH CLIENT REGARDING DEPOSITIONS (.2).
6/8/2021	CURTIS J CHRISTENSEN	0.40	0.00	TELEPHONE CONFERENCE WITH COURT REPORTER REGARDING DEPOSITION CANCELLATIONS (.2); E-MAIL COURT REPORTER

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				REGARDING CONFIRMATION OF CANCELLATIONS (.1); E-MAIL CLIENT REGARDING SAME (.1).
6/8/2021	CURTIS J CHRISTENSEN	0.20	0.00	CONTACT PROCESS SERVER REGARDING SERVICE OF SUBPOENA ON CAROL FUNK.
6/10/2021	CURTIS J CHRISTENSEN	0.30	55.50	TELEPHONE CONFERENCE WITH PEGGY FORAKER REGARDING DEPOSITION AND INTERVIEWING TARA TREJO.
6/10/2021	CURTIS J CHRISTENSEN	0.30	0.00	CONTACT PEGGY FORAKER REGARDING INTERVIEW OF TARA TREJO.
6/17/2021	CURTIS J CHRISTENSEN	3.00	555.00	REVIEW SUPPLEMENTAL PRODUCTION FROM STATE FARM AND INDEX SAME FOR ATTORNEY REFERENCE DURING DEPOSITIONS.
6/18/2021	BRADLEY W. ANDERSEN	2.20	847.00	BEGIN TO PREPARE FOR DEPOSITION OF FUNK BY CONFERRING WITH BRAD SMITH TO GO OVER FACTS TO OBTAIN FROM THE DEPOSITION.
6/18/2021	CURTIS J CHRISTENSEN	2.70	499.50	BEGIN PREPARING FOR UPCOMING DEPOSITIONS (2.0); TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING DEPOSITIONS AND THEMES AND THEORIES OF CASE (.7).
6/18/2021	CURTIS J CHRISTENSEN	0.20	37.00	BRIEF DISCUSSION WITH ATTORNEY REGARDING DEPOSITION PREPARATION.
6/19/2021	BRADLEY W. ANDERSEN	3.20	1,232.00	CONTINUE TO REVIEW AND COMPILE THE DOCUMENTS FOR DEPOSITIONS OF STEWART, DALE ANDERSEN, CAROL FUNK, AND PEGGY FORAKER.
6/20/2021	BRADLEY W. ANDERSEN	4.80	1,848.00	CONTINUE TO REVIEW AND COMPILE DOCUMENTS FOR DEPOSITIONS.
6/21/2021	MONICA M RECH	4.00	0.00	ASSIST ATTORNEY BRAD ANDERSEN WITH SET UP OF ZOOM AND DEPOSITION EXHIBITS USING TRIAL DIRECTOR DURING WITNESS RICH STEWARD'S DEPOSITION.

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
6/21/2021	BRADLEY W. ANDERSEN	8.20	3,157.00	PREPARE AN OUTLINE FOR TAKING MR. STEWART'S DEPOSITION (3.2); TAKE MR. STEWART'S DEPOSITION (3.5), TRAVEL TO DALE'S HOUSE TO PREPARE HIM FOR HIS DEPOSITION (1.5).
6/21/2021	CURTIS J CHRISTENSEN	0.40	74.00	REVIEW DISCOVERY REQUESTS AND LETTERS TO OPPOSING COUNSEL REGARDING INSUFFICIENT DISCOVERY (.2); E-MAIL ATTORNEYS SUMMARY REGARDING SAME (.2).
6/21/2021	CURTIS J CHRISTENSEN	2.40	444.00	MEET WITH ATTORNEY TO DISCUSS DEPOSITION EXHIBITS (1.2); PREPARE EXHIBITS FOR USE IN DEPOSITION (.8); MULTIPLE DISCUSSIONS WITH ATTORNEY REGARDING DEPOSITION THEMES AND THEORIES (.2); CONFIRM DEPOSITION OF CAROL FUNK WITH COURT REPORTER (.2).
6/21/2021	MONICA M RECH	1.00	95.00	ASSIST ATTORNEY BRAD ANDERSEN WITH COPYING AND SORTING DEPOSITION EXHIBITS OF WITNESS PEGGY FORAKER IN ANTICIPATION OF DEPOSITION.
6/21/2021	CURTIS J CHRISTENSEN	0.20	0.00	REVIEW ATTORNEY CALENDAR AND RESPOND TO E-MAILS FROM OPPOSING COUNSEL AND CO-COUNSEL REGARDING DEPOSITIONS.
6/21/2021	CURTIS J CHRISTENSEN	0.30	0.00	EXTRACT DOCUMENTS TO SEND TO CLIENT (.1); SEND CLIENT MULTIPLE E-MAILS REGARDING DEPOSITION PREPARATION (.2).
6/22/2021	BRADLEY W. ANDERSEN	0.40	154.00	BEGIN TO DRAFT DEPOSITION SUMMARY.
6/22/2021	BRADLEY W. ANDERSEN	2.80	1,078.00	DEFEND DALE ANDERSEN'S DEPOSITION.
6/22/2021	CURTIS J CHRISTENSEN	0.20	37.00	RESPOND TO E-MAIL FROM OPPOSING COUNSEL REGARDING DEPOSITION OF EXPERT.
6/22/2021	CURTIS J CHRISTENSEN	0.40	74.00	DRAFT STIPULATED MOTION TO EXTEND DISCOVERY CUTOFF; DRAFT PROPOSED ORDER FOR SAME.

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DALE E. ANDERSON

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
6/22/2021	CURTIS J CHRISTENSEN	1.70	314.50	MULTIPLE TELEPHONE CONFERENCES WITH ATTORNEY REGARDING CAROL FUNK DEPOSITION (.4); ASSEMBLE EXHIBITS FROM RICH STEWART'S DEPOSITION AND SEND SAME TO COURT REPORTER (.3); DRAFT NEW SUBPOENA AND DEPOSITION NOTICE FOR CAROL FUNK (.3); EXCHANGE MULTIPLE COMMUNICATIONS WITH ATTORNEY REGARDING CLIENT'S PRIOR INSURANCE POLICIES (.4); EXCHANGE MULTIPLE E-MAILS WITH OPPOSING COUNSEL REGARDING SUPPLEMENTAL PRODUCTION (.3).
6/23/2021	CURTIS J CHRISTENSEN	0.50	92.50	DISCUSSION WITH ATTORNEY REGARDING MS. FUNK (.1); DRAFT ACCEPTANCE OF SERVICE FOR SUBPOENA (.3); E-MAIL MS. FUNK REGARDING SAME (.1).
6/23/2021	CURTIS J CHRISTENSEN	0.20	37.00	EXCHANGE E-MAILS WITH EXPERT REGARDING DEPOSITION.
6/23/2021	CURTIS J CHRISTENSEN	0.30	55.50	PREPARE SUPPLEMENTAL PRODUCTION OF RECORDS RECEIVED FROM HELLER WEIGENSTEIN (.2); E-MAIL OPPOSING COUNSEL REGARDING SAME (.1).
6/23/2021	CURTIS J CHRISTENSEN	0.70	129.50	TELEPHONE CONFERENCE WITH ATTORNEY REGARDING DEPOSITION EXHIBITS FOR PEGGY FORAKER (.2); PREPARE EXHIBITS FOR PEGGY FORAKER AND COORDINATE WITH CLERK REGARDING SAME FOR DEPOSITION (.5).
6/24/2021	BRADLEY W. ANDERSEN	6.00	2,310.00	REVIEW DOCUMENTS FOR DEPOSITION OF PEGGY FORAKER.
6/24/2021	CURTIS J CHRISTENSEN	0.60	111.00	MULTIPLE CONFERENCE CALLS WITH PEGGY FORAKER REGARDING DEPOSITION AND INTERVIEWING TARA TREJO (.5); E-MAIL PEGGY FORAKER COPIES OF ALL DEPOSITION EXHIBITS (.1).
6/24/2021	CURTIS J CHRISTENSEN	0.60	0.00	MULTIPLE COMMUNICATIONS WITH COURT REPORTER AND VIDEOGRAPHER REGARDING

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
DEPOSITION DETAILS AND PAYMENT INFORMATION.				
6/25/2021	BRADLEY W. ANDERSEN	3.00	1,155.00	TRAVEL TO PEGGY FORAKERS HOUSE TO PREPARE HER FOR HER DEPOSITION.
6/25/2021	BRADLEY W. ANDERSEN	3.20	1,232.00	TAKE THE DEPOSITION OF PEGGY FORAKER AND RETURN TO THE HOTEL.
6/25/2021	CURTIS J CHRISTENSEN	0.30	55.50	MULTIPLE CONFERENCE CALLS WITH ATTORNEY AND COURT REPORTER REGARDING DEPOSITION OF PEGGY FORAKER.
6/25/2021	CURTIS J CHRISTENSEN	0.20	37.00	TELEPHONE CONFERENCE WITH ATTORNEY REGARDING DEPOSITION OF FORAKER (.1); CONTACT VIDEOGRAPHER REGARDING SAME (.1).
6/25/2021	CURTIS J CHRISTENSEN	0.30	0.00	E-MAIL OPPOSING COUNSEL AND COURT REPORTER EXHIBITS FOR PEGGY FORAKER DEPOSITION.
6/26/2021	BRADLEY W. ANDERSEN	6.00	2,310.00	CONTINUE SUMMARIZING DEPOSITIONS.
6/28/2021	CURTIS J CHRISTENSEN	0.30	0.00	DISCUSSION WITH ATTORNEY REGARDING STIPULATION (.2); E-MAIL OPPOSING COUNSEL REGARDING SAME (.1).
6/29/2021	CURTIS J CHRISTENSEN	0.10	0.00	FOLLOW-UP WITH CAROL FUNK REGARDING ACCEPTANCE OF SERVICE OF SUBPOENA FOR DEPOSITION.
6/30/2021	CURTIS J CHRISTENSEN	0.50	92.50	MEET WITH ATTORNEY TO DISCUSS CASE DEADLINES AND E-MAILS EXCHANGED WITH OPPOSING COUNSEL REGARDING SAME (.2); REVISE DRAFT STIPULATION TO EXTEND DATES (.2); E-MAIL OPPOSING COUNSEL REGARDING SAME (.1).
7/3/2021	BRADLEY W. ANDERSEN	0.40	154.00	REVIEW AND REVISE THE STIPULATED MOTION TO EXTEND THE DISCOVERY DEADLINE SO THAT WE CAN TAKE CAROL FUNK'S DEPOSITION.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
7/3/2021	BRADLEY W. ANDERSEN	0.50	192.50	MEET WITH ZACK REGARDING THE RESULTS OF LAST WEEKS DEPOSITION, INCLUDING THE PERPETUATION TESTIMONY OF MS. FORAKER.
7/6/2021	CURTIS J CHRISTENSEN	0.40	0.00	SAVE SUPPLEMENTAL PRODUCTION FROM STATE FARM AND REVIEW SAME.
7/6/2021	CURTIS J CHRISTENSEN	0.20	0.00	SUBMIT CHECK REQUEST FOR CAROL FUNK WITNESS FEE.
7/8/2021	BRADLEY W. ANDERSEN	1.80	693.00	REVIEW MS. FUNK'S PERSONNEL FILE TO MARK DOCUMENTS NEEDED FOR HER DEPOSITION AND BEGIN TO MARK OTHER EXHIBITS FOR THE DEPOSITION.
7/8/2021	CURTIS J CHRISTENSEN	4.00	740.00	MULTIPLE COMMUNICATIONS WITH COURT REPORTERS REGARDING EMERGENCY RESCHEDULING (.4); MEET WITH ATTORNEY TO DISCUSS EXHIBITS FOR CAROL FUNK DEPOSITION (1.1); PREPARE EXHIBITS FROM PRIOR DEPOSITIONS INTO BINDER FOR ATTORNEY, WITNESS AND OPPOSING COUNSEL (1.2); PREPARE ADDITIONAL EXHIBITS FOR CAROL FUNK (1.2); BRIEF TELEPHONE CONFERENCE WITH CLIENT REGARDING DEPOSITION (.1);
7/9/2021	BRADLEY W. ANDERSEN	8.00	3,080.00	TRAVEL TO TACOMA TO TAKE MS. FUNK'S DEPOSITION AND RETURN TO OFFICE.
7/9/2021	CURTIS J CHRISTENSEN	0.20	37.00	DISCUSSION WITH ATTORNEY REGARDING WITNESS TESTIMONY DURING DEPOSITION.
7/9/2021	CURTIS J CHRISTENSEN	0.30	55.50	DISCUSSION WITH ATTORNEY AND COURT REPORTER REGARDING EXHIBITS (.2); E-MAIL COURT REPORTER REGARDING SAME (.1).
7/12/2021	CURTIS J CHRISTENSEN	0.40	74.00	CONTACT COURT REPORTERS REGARDING TRANSCRIPT STATUS (.2); EXCHANGE E-MAILS WITH ATTORNEYS REGARDING SAME (.1); DISCUSSION WITH ATTORNEY REGARDING EXPERT REVIEW OF TRANSCRIPTS (.1).

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
7/13/2021	CURTIS J CHRISTENSEN	0.30	0.00	DOWNLOAD AND SAVE DEPOSITION TRANSCRIPT AND EXHIBITS FOR PEGGY FORAKER RECEIVED FROM COURT REPORTER (.2); GENERATE AND SEND LINK TO SAME TO CLIENT AND CO-COUNSEL (.1).
7/15/2021	CURTIS J CHRISTENSEN	0.30	0.00	DOWNLOAD AND SAVE DEPOSITION TRANSCRIPT AND EXHIBITS FOR SAME FROM COURT REPORTER; E-MAIL CO-COUNSEL AND CLIENT REGARDING SAME.
7/22/2021	CURTIS J CHRISTENSEN	0.20	37.00	MULTIPLE COMMUNICATIONS WITH CO-COUNSEL REGARDING DEPOSITIONS.
7/26/2021	CURTIS J CHRISTENSEN	0.50	92.50	REVIEW FILES FOR DOCUMENTS REQUESTED BY ATTORNEY BRAD SMITH (.3); E-MAIL BRAD SMITH REGARDING DEPOSITIONS (.2).
7/28/2021	CURTIS J CHRISTENSEN	0.20	37.00	EXCHANGE MULTIPLE E-MAILS WITH CO-COUNSEL REGARDING DEPOSITIONS.
7/31/2021	BRADLEY W. ANDERSEN	0.50	192.50	REVIEW AND RESPOND TO E-MAILS FROM BRAD SMITH WITH REGARD TO HIS DEPOSITION OF THE INSURANCE COMPANIES EXPERT.
8/2/2021	CURTIS J CHRISTENSEN	0.20	37.00	EXCHANGE E-MAILS WITH CO-COUNSEL REGARDING DEPOSITION OF OLIE JOLSTAD.
8/9/2021	CURTIS J CHRISTENSEN	0.30	55.50	REVISE 30(B)(6) DEPOSITION NOTICE FOR STATE FARM AND SERVE SAME ON OPPOSING COUNSEL (.2); E-MAIL CO-COUNSEL REGARDING COURT REPORTER (.1).
8/9/2021	CURTIS J CHRISTENSEN	0.30	55.50	EXCHANGE MULTIPLE E-MAILS WITH CO-COUNSEL AND THIRD PARTY VENDORS REGARDING DEPOSITION (.2); E-MAIL CLIENT REGARDING SAME (.1).
8/11/2021	CURTIS J CHRISTENSEN	0.20	0.00	REVIEW SUPPLEMENTAL DOCUMENT PRODUCTION FROM STATE FARM.
8/16/2021	CURTIS J CHRISTENSEN	0.30	55.50	DISCUSSION WITH ATTORNEY REGARDING DEPOSITIONS AND DISCOVERY CUTOFF (.1);

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INVOICE DATE: MAY 30, 2024

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				AMEND DEPOSITION NOTICE FOR FRCP 30(B)(6) (.2).
8/23/2021	BRADLEY W. ANDERSEN	0.80	308.00	REVIEW NEW DISCOVERY DOCUMENTS PROVIDED BY STATE FARM (.6), AND TELEPHONE CONFERENCE WITH BRAD SMITH REGARDING THE SAME (.2).
8/23/2021	CURTIS J CHRISTENSEN	0.60	111.00	TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING SUPPLEMENTAL DOCUMENTS FROM OPPOSING COUNSEL.
8/30/2021	BRADLEY W. ANDERSEN	1.00	385.00	REVIEW THE RECENT DISCOVERY MATERIALS PROVIDED BY THE INSURANCE COMPANY (.6), AND TELEPHONE CONFERENCE AND EXCHANGE OF EMAILS WITH BRAD SMITH REGARDING THE SAME (.4).
9/8/2021	CURTIS J CHRISTENSEN	0.30	0.00	DOWNLOAD AND SAVE SUPPLEMENTAL PRODUCTION FROM STATE FARM.
9/9/2021	BRADLEY W. ANDERSEN	1.10	423.50	REVIEW THE MOST RECENT DISCOVERY RESPONSES (.5); LONG TELEPHONE CONFERENCE WITH BRAD WITH REGARD TO HIS VIEW OF THE CASE AND DISCUSS WITH BRAD SETTLEMENT STRATEGIES (FOLLOW UP WITH ATTORNEY STOUMBOS REGARDING THE SAME) (.6).
9/9/2021	CURTIS J CHRISTENSEN	0.50	92.50	TELEPHONE CONFERENCE WITH ATTORNEYS REGARDING STRATEGY (.3); EXCHANGE MULTIPLE E-MAILS WITH CO-COUNSEL (.2).
10/19/2021	CURTIS J CHRISTENSEN	0.30	55.50	PREPARE AMENDED NOTICE OF DEPOSITION OF FRCP 30(B)(6) DESIGNEE OF STATE FARM.
10/25/2021	CURTIS J CHRISTENSEN	0.10	0.00	EXCHANGE E-MAILS WITH TEAM REGARDING INVOICE FOR EXPERT FEES.
11/4/2021	PRECIOUS M MILLER	0.30	0.00	SAVE AND REVIEW DEPOSITION AND EXHIBITS OF STEVEN MCALISTER.
11/9/2021	BRADLEY W. ANDERSEN	0.70	269.50	REVIEW AND RESPOND TO BRAD SMITHS EMAIL REGARD TO NEXT STEPS

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
11/9/2021	BRADLEY W. ANDERSEN	0.50	192.50	REVIEW THE NEW DISCOVERY DOCUMENTS THAT WERE PRODUCED BY STATE FARM.
11/9/2021	BRADLEY W. ANDERSEN	0.30	115.50	TELEPHONE CONFERENCE WITH DALE
11/9/2021	BRADLEY W. ANDERSEN	1.20	462.00	REVIEW AND SUMMARIZE THE DEPOSITION OF MCALISTER
11/10/2021	BRADLEY W. ANDERSEN	0.90	346.50	LONG TELEPHONE CONFERENCE WITH BRAD SMITH TO REVIEW THE RESULTS OF HIS DEPOSITION RESULTS OF MCALISTER, THE NEW DOCUMENTS PRODUCED BY STATE FARM, SUMMARY JUDGMENT AND SETTLEMENT STRATEGIES.
11/10/2021	BRADLEY W. ANDERSEN	0.50	192.50	BEGIN TO DRAFT AND REVISE SETTLEMENT OFFER FOR BRAD'S REVIEW
11/10/2021	BRADLEY W. ANDERSEN	1.10	0.00	ANALYZE WHETHER WE SHOULD PROCEED WITH A MOTION FOR SUMMARY JUDGMENT, INCLUDING A REVIEW OF THE 2017 WASHINGTON SUPREME COURT DECISION ANALYZING IFCA.
11/19/2021	ZACHARY H. STOUMBOS	0.20	70.00	REVIEW AND COMMENT ON PROPOSED SETTLEMENT LETTER.
12/3/2021	BRADLEY W. ANDERSEN	1.20	462.00	REVIEW AND REVISE SETTLEMENT LETTER.
12/8/2021	ZACHARY H. STOUMBOS	0.30	105.00	REVIEW SETTLEMENT LETTER AND DISCUSS SAME WITH DALE.
12/29/2021	BRADLEY W. ANDERSEN	0.30	115.50	REVIEW COURT RULES ON STATUS CONFERENCE.
12/29/2021	BRADLEY W. ANDERSEN	0.50	192.50	TELEPHONE CONFERENCE WITH BRAD SMITH WITH REGARD TO POTENTIAL MEDIATORS AND MEDIATION STRATEGIES.
12/29/2021	BRADLEY W. ANDERSEN	0.80	308.00	JUDICIAL STATUS CONFERENCE WITH DAN SYHRE AND BRAD SMITH WITH REGARD TO JOINT STATUS REPORT.
12/29/2021	PRECIOUS M MILLER	1.00	150.00	CONFERENCE WITH ATTORNEY ANDERSEN, SMITH AND SHYRE RE UPCOMING CASE STATES UPDATE.

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
12/30/2021	BRADLEY W. ANDERSEN	0.80	308.00	DRAFT AND REVISE JOINT STATUS REPORT AND DISCOVERY PLAN.
1/4/2022	BRADLEY W. ANDERSEN	0.20	81.00	EXCHANGE OF EMAILS WITH BRAD SMITH REGARDING THE MEDIATION, AS WELL AS TO REVIEW THE POTENTIAL MEDIATOR.
1/4/2022	BRADLEY W. ANDERSEN	0.30	121.50	LONG TELEPHONE CONFERENCE WITH DAN SYHRE WITH REGARD TO OUR STATUS REPORT AND TO GET HIS AVAILABLE DATES FOR TRIAL AND MEDIATION.
1/4/2022	BRADLEY W. ANDERSEN	0.60	243.00	MAKE REVISION TO THE STATUS REPORT AND EMAIL THE DRAFT TO THE OTHER SIDE SO THAT WE CAN MAKE FINAL CHANGES AND SUBMIT TO THE COURT.
1/4/2022	PRECIOUS M MILLER	0.50	75.00	CONFER WITH ATTORNEY ANDERSEN, SMITH AND SHYRE RE JOINT STATUS REPORT.
2/17/2022	BRADLEY W. ANDERSEN	0.40	162.00	ENGAGE THE MEDIATOR WITH REGARD TO THE MEDIATION AGREEMENT AND FORWARD TO DALE FOR HIS SIGNATURE AND FOLLOW-UP WITH THE MEDIATOR AND WITH BRAD AND ZACH WITH REGARD TO WHO'S ATTENDING.
2/18/2022	BRADLEY W. ANDERSEN	1.80	729.00	REVIEW AND REVISE MEDIATION LETTER.
2/22/2022	BRADLEY W. ANDERSEN	0.60	243.00	MEET WITH ATTORNEY STOUMBOS TO CALCULATE ALL LEGAL FEES AND COSTS, AND DIRECT PARALEGAL AND STAFF WHERE TO OBTAIN RELEVANT INFORMATION.
2/22/2022	BRADLEY W. ANDERSEN	0.40	162.00	RESEARCH AVAILABILITY OF EMOTIONAL DISTRESS DAMAGES UNDER WASHINGTON LAW.
2/22/2022	ZACHARY H. STOUMBOS	0.60	210.00	REVIEW MEDIATION STATEMENT AND PREPARE FOR MEDIATION.
3/8/2022	BRADLEY W. ANDERSEN	0.50	202.50	ANALYZE THE FEDERAL LOCAL COURT RULES AND PREVIOUS ORDER WITH REGARD TO MEDIATION (.3); EMAIL TO DAN SYHRE AND BRAD SMITH REGARDING SAME (.2).

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
3/30/2022	BRADLEY W. ANDERSEN	0.40	162.00	REVIEW THE TRANSCRIPT OF CLIENT'S DEPOSITIONS WITH REGARD TO EMOTIONAL DISTRESS AND ANALYSIS WITH REGARD TO SAME.
3/30/2022	BRADLEY W. ANDERSEN	0.40	162.00	REVIEW AND REVISE TO E-MAIL FROM STATE FARM'S ATTORNEY WITH REGARD TO UPCOMING MEDIATION AND FUTURE MOTION TO AMEND COMPLAINT.
3/30/2022	BRADLEY W. ANDERSEN	0.40	162.00	REVIEW AND RESPOND TO BRAD SMITH'S E-MAIL REGARDING SETTLEMENT DISCUSSIONS WITH STATE FARM.
3/31/2022	NICHOLAS F CODY	0.30	85.50	RESEARCH WASHINGTON LAW ON WAIVER AND REVOCATION OF WAIVER (.2); TELEPHONE CALL WITH ATTORNEY ANDERSEN REGARDING SAME (.1).
4/11/2022	ZACHARY H. STOUMBOS	0.50	175.00	PREPARE FOR MEDIATION.
4/13/2022	BRADLEY W. ANDERSEN	1.40	567.00	LONG MEETING WITH BRAD AND ZACH TO PREPARE FOR MEDIATION.
4/13/2022	BRADLEY W. ANDERSEN	0.80	324.00	PROVIDE FURTHER ANALYSIS FOR BRAD AND ZACH TO USE IN TOMORROW'S DEPOSITION, INCLUDING PROVIDING ZACH WITH VARIOUS EXHIBITS AND DOCUMENTS.
4/13/2022	BRADLEY W. ANDERSEN	0.60	243.00	REVIEW MEDIATION SUBMITTAL IN PREPARATION FOR MEETING WITH BRAD SMITH AND ZACH.
4/13/2022	PRECIOUS M MILLER	0.40	64.00	DOWNLOAD ANDERSON PRODUCTION 241-321 COMBINE AND E-MAIL TO BRAD SMITH FOR MEDIATION PREPARATION.
4/13/2022	ZACHARY H. STOUMBOS	2.20	770.00	STRATEGY AND PREPARATION FOR MEDIATION.
4/14/2022	PRECIOUS M MILLER	0.20	0.00	SAVE ELECTRONIC VERSIONS OF CAROL FUNK DEPOSITION AND EXHIBITS TO CLIENT FILE.
4/14/2022	PRECIOUS M MILLER	0.20	0.00	SET UP CONFERENCE ROOM FOR MEDIATION AND CONFER WITH LEGAL ASSISTANT REGARDING MEDIATION SCHEDULE.

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/14/2022	CURTIS J CHRISTENSEN	0.20	37.00	WORK ON SCHEDULING DEPOSITIONS.
4/14/2022	ZACHARY H. STOUMBOS	5.50	1,925.00	MEDIATION.
4/20/2022	BRADLEY W. ANDERSEN	0.40	0.00	REVIEW SCHEDULING ORDER WITH REGARD TO NEXT STEPS ON FILING A MOTION FOR SUMMARY JUDGMENT.
4/20/2022	BRADLEY W. ANDERSEN	0.40	0.00	PROVIDE BRAD SMITH WITH MY COMMENTS ON THE PROPOSED LETTER TO THE MEDIATOR AND MOTION TO AMEND COMPLAINT.
4/21/2022	NICHOLAS F CODY	0.80	228.00	RESEARCH AND ANALYZE PLEADING SPECIFICITY FOR EMOTIONAL DISTRESS DAMAGES (.6); DRAFT EMAIL TO ATTORNEYS ANDERSEN AND SMITH SUMMARIZING SAME (.2).
4/21/2022	ZACHARY H. STOUMBOS	0.20	70.00	COMMENTS REGARDING NEW CASE AND POTENTIAL TO RECOVER EMOTIONAL DISTRESS DAMAGES.
4/25/2022	BRADLEY W. ANDERSEN	0.40	162.00	CONFER WITH BRAD SMITH AND NICK ON OUR STRATEGIES FOR FILING A MOTION TO AMEND COMPLAINT.
4/25/2022	NICHOLAS F CODY	3.10	541.50	CONFERENCE CALL WITH ATTORNEYS ANDERSEN AND SMITH REGARDING MOTIONS FOR SUMMARY JUDGMENT AND TO AMEND PLEADINGS [1.2]; BEGIN DRAFTING MOTION TO AMEND COMPLAINT [1.9].
4/25/2022	BRADLEY W. ANDERSEN	0.40	0.00	ANALYZE STATE FARM'S ANTICIPATED CROSS MOTION FOR SUMMARY JUDGMENT ON OUR IFCA CLAIMS AND STRATEGIZE RESPONSE TO SAME.
4/25/2022	BRADLEY W. ANDERSEN	1.20	0.00	CONFER WITH BRAD AND NICK ON OUR MOTION FOR SUMMARY JUDGMENT.
4/26/2022	NICHOLAS F CODY	2.10	598.50	CONTINUE DRAFTING MOTION TO AMEND COMPLAINT.
4/27/2022	NICHOLAS F CODY	1.30	370.50	REVIEW AND REVISE MOTION TO AMEND COMPLAINT AND DRAFT FIRST AMENDED

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				COMPLAINT (1.2); SEND TO ATTORNEY ANDERSEN FOR REVIEW (.1).
4/27/2022	NICHOLAS F CODY	0.10	28.50	TELEPHONE CALL WITH ATTORNEY ANDERSEN REGARDING MOTION TO AMEND COMPLAINT.
4/29/2022	BRADLEY W. ANDERSEN	1.80	729.00	DRAFT AND REVISE MY DECLARATION IN SUPPORT OF MOTION TO AMEND.
4/29/2022	BRADLEY W. ANDERSEN	0.50	202.50	FINALIZE DECLARATION, MOTION TO AMEND, AND THE AMENDED COMPLAINT.
4/29/2022	BRADLEY W. ANDERSEN	1.10	445.50	REVIEW AND REVISE MOTION TO AMEND COMPLAINT TO INCLUDE NON-ECONOMIC DAMAGES.
4/29/2022	NICHOLAS F CODY	0.30	85.50	DRAFT PROPOSED ORDER ON MOTION TO AMEND COMPLAINT.
4/29/2022	NICHOLAS F CODY	0.50	142.50	TELEPHONE CALL WITH ATTORNEY SMITH REGARDING EDITS TO MOTION TO AMEND COMPLAINT.
4/29/2022	PRECIOUS M MILLER	2.50	400.00	WORK WITH ATTORNEY ANDERSEN TO FINALIZE ANDERSEN DECLARATION IN SUPPORT OF MOTION TO AMEND AND ADD EXHIBITS TO DECLARATION.
5/16/2022	NICHOLAS F CODY	0.30	85.50	BRIEF REVIEW OF RESPONSE TO MOTION TO AMEND COMPLAINT (.2); TELEPHONE CALL WITH ATTORNEY ANDERSEN REGARDING SAME (.1).
5/20/2022	BRADLEY W. ANDERSEN	0.80	324.00	REVIEW AND ANALYZE THE STATE FARMS RESPONSE TO OUR MOTION TO AMEND THE COMPLAINT.
5/20/2022	BRADLEY W. ANDERSEN	1.20	486.00	RESEARCH "GOOD CAUSE" STANDARD UNDER FRCP 16.
5/20/2022	BRADLEY W. ANDERSEN	0.40	162.00	RESEARCH REGARDING SPECIFICITY OF CLAIM FOR DAMAGES.

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INVOICE DATE: MAY 30, 2024

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/20/2022	BRADLEY W. ANDERSEN	4.20	1,701.00	DRAFT AND REVISE REPLY IN SUPPORT OF OUR MOTION TO AMEND THE COMPLAINT.
5/20/2022	NICHOLAS F CODY	2.10	598.50	REVIEW AND REVISE REPLY IN SUPPORT OF MOTION TO AMEND COMPLAINT.
5/20/2022	NICHOLAS F CODY	0.40	114.00	MULTIPLE TELEPHONE CALLS WITH ATTORNEY ANDERSEN REGARDING MOTION TO AMEND COMPLAINT.
5/26/2022	PRECIOUS M MILLER	0.80	0.00	REVIEW PEGGY FORAKER DEPOSITION AND EXTRACT EXCERPTS FOR ATTORNEY ANDERSEN TO REVIEW FOR MOTION FOR SUMMARY JUDGMENT.
5/26/2022	CURTIS J CHRISTENSEN	0.10	18.50	DISCUSSION WITH PARALEGAL REGARDING DEPOSITIONS.
5/26/2022	BRADLEY W. ANDERSEN	2.90	0.00	REVIEW AND REVISE MOTION FOR PARTIAL SUMMARY JUDGMENT.
5/27/2022	BRADLEY W. ANDERSEN	1.20	0.00	LONG TELEPHONE CONFERENCE WITH BRAD SMITH REGARDING MOTION FOR PARTIAL SUMMARY JUDGMENT.
5/30/2022	BRADLEY W. ANDERSEN	0.40	162.00	RESEARCH REGARDING INSURER'S LEGAL DUTIES TO NOTIFY INSURED OF COVERAGE ISSUES.
5/30/2022	BRADLEY W. ANDERSEN	4.20	0.00	CONTINUE TO REVIEW AND REVISE OUR MOTION FOR PARTIAL SUMMARY JUDGMENT.
5/30/2022	BRADLEY W. ANDERSEN	1.20	0.00	RESEARCH REGARDING SUMMARY JUDGMENT ON BAD FAITH LITIGATION.
5/30/2022	BRADLEY W. ANDERSEN	0.40	0.00	RESEARCH INSURER'S DUTIES TO INVESTIGATE OTHER INSURANCE POLICIES.
5/30/2022	BRADLEY W. ANDERSEN	0.60	0.00	RESEARCH REGARDING CORPORATE ADMISSIONS.
5/31/2022	AMANDA P BEATSON	0.20	0.00	INSERT EXHIBITS INTO MOTION FOR SUMMARY JUDGMENT.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/31/2022	BRADLEY W. ANDERSEN	0.00	0.00	DRAFT AND REVISE STATEMENT OF UNDISPUTED FACTS.
5/31/2022	NICHOLAS F CODY	4.90	0.00	REVIEW AND REVISE MOTION FOR SUMMARY JUDGMENT.
5/31/2022	BRADLEY W. ANDERSEN	1.50	0.00	DRAFT AND REVISE DECLARATION TO ATTACH EXHIBITS A-P TO SUPPORT OUR MOTIONS FOR SUMMARY JUDGMENT.
5/31/2022	BRADLEY W. ANDERSEN	1.20	0.00	REVIEW THE VARIOUS DEPOSITIONS TO OBTAIN EXCERPTS FROM THE DEPOSITION OF FORAKER AND OTHERS TO ATTACH TO OUR DECLARATION.
6/1/2022	NICHOLAS F CODY	1.20	0.00	REVIEW AND ANALYZE STATE FARM'S MOTION FOR SUMMARY JUDGMENT AND CASE LAW REGARDING INSURANCE FAIR CONDUCT ACT.
6/1/2022	BRADLEY W. ANDERSEN	0.80	0.00	REVIEW AND ANALYZE STATE FARMS MOTION FOR SUMMARY JUDGMENT.
6/2/2022	BRADLEY W. ANDERSEN	0.50	0.00	TELEPHONE CONFERENCE WITH BRAD SMITH REGARDING STATE FARM'S MOTION FOR SUMMARY JUDGMENT.
6/8/2022	BRADLEY W. ANDERSEN	0.70	283.50	REVIEW STATE FARM'S CONFESSION OF JUDGMENT AND RESEARCH FEDERAL RULES OF CIVIL PROCEDURE 68.
6/8/2022	NICHOLAS F CODY	0.90	256.50	RESEARCH REGARDING RULE 68 OFFER OF JUDGMENT.
6/8/2022	NICHOLAS F CODY	0.30	85.50	TELEPHONE CALL WITH ATTORNEYS ANDERSEN AND SMITH REGARDING OFFER OF JUDGMENT.
6/9/2022	NICHOLAS F CODY	0.80	228.00	CONTINUE RESEARCHING RULE 68 OFFERS OF JUDGMENT.
6/10/2022	NICHOLAS F CODY	4.30	1,225.50	COMPLETE RESEARCH REGARDING RULE 68 OFFERS OF JUDGMENT (3.1); SUMMARIZE CONCLUSIONS AND DRAFT MEMO TO ATTORNEYS ANDERSEN, SMITH, AND STOUMBOS (1.2).

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
6/13/2022	NICHOLAS F CODY	0.50	142.50	REVIEW ORDER ON MOTION TO AMEND; REVISE FIRST AMENDED COMPLAINT AND SEND TO ATTORNEY ANDERSEN FOR REVIEW.
6/15/2022	NICHOLAS F CODY	1.40	399.00	ADDITIONAL RESEARCH AND CORRESPONDENCE REGARDING RULE 68 OFFER OF JUDGMENT.
6/16/2022	BRADLEY W. ANDERSEN	0.60	243.00	MEET WITH ZACH WITH REGARD TO SETTLEMENT OFFER AND THE EFFECTS OF STATE FARMS CONFESSION OF JUDGMENT.
6/17/2022	BRADLEY W. ANDERSEN	0.90	364.50	MEET WITH ZACH AND BRAD WITH REGARD TO POTENTIAL AMENDED COMPLAINT AND STATE FARM'S CONFESSION OF JUDGMENT.
6/17/2022	NICHOLAS F CODY	2.00	0.00	REVIEW DRAFT RESPONSE TO SUMMARY JUDGMENT (1.4); CONFERENCE CALL WITH ATTORNEYS ANDERSEN, STOUMBOS, AND SMITH (.6).
6/17/2022	BRADLEY W. ANDERSEN	1.10	0.00	BEGIN TO REVIEW STATE FARM'S BRIEF ON THE DISMISSAL OF THE IFCA CLAIM AND CONFER WITH BRAD SMITH REGARDING REPLY.
6/20/2022	NICHOLAS F CODY	0.30	0.00	TELEPHONE CALL WITH ATTORNEY ANDERSEN REGARDING RESPONSE TO STATE FARM'S MOTION FOR SUMMARY JUDGMENT.
6/20/2022	NICHOLAS F CODY	0.40	0.00	FOLLOW UP TELEPHONE CALL WITH ATTORNEY ANDERSEN REGARDING RESPONSE TO STATE FARM'S MOTION FOR SUMMARY JUDGMENT.
6/20/2022	NICHOLAS F CODY	0.60	0.00	INITIAL REVIEW AND REVISIONS TO RESPONSE TO STATE FARM'S MOTION FOR SUMMARY JUDGMENT.
6/20/2022	BRADLEY W. ANDERSEN	3.20	0.00	BEGIN TO REVIEW AND REVISE OUR REPLY BRIEF.
6/20/2022	BRADLEY W. ANDERSEN	2.10	0.00	RESEARCH THE LAW REGARDING INSURER'S CLAIMS HANDLING DUTIES IN PREPARING RESPONSE TO SUMMARY JUDGMENT MOTION.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
6/21/2022	PRECIOUS M MILLER	4.50	0.00	REVIEW RELEVANT PORTIONS OF FUNK, FORAKER AND ANDERSON DEPOSITION FOR EXHIBITS (3.1); REVIEW AND CONFIRM EXHIBITS FOR REPLY BRIEF OF OUR MOTION FOR PARTIAL SUMMARY JUDGMENT (1.4).
6/21/2022	NICHOLAS F CODY	2.80	0.00	REVIEW AND REVISE RESPONSE TO STATE FARM'S MOTION FOR SUMMARY JUDGMENT.
6/21/2022	BRADLEY W. ANDERSEN	0.30	121.50	FOLLOW-UP LETTER TO CLIENT.
6/21/2022	BRADLEY W. ANDERSEN	1.10	445.50	MEET WITH ZACH AND CLIENT TO DISCUSS VARIOUS ISSUES, INCLUDING AMENDING THE COMPLAINT, EMOTIONAL DISTRESS DAMAGES, THE SETTLEMENT OFFER.
6/21/2022	BRADLEY W. ANDERSEN	0.40	162.00	FINALIZE AMENDED COMPLAINT.
6/21/2022	BRADLEY W. ANDERSEN	0.70	283.50	RESEARCH REGARDING EMOTIONAL DISTRESS DAMAGES.
6/21/2022	BRADLEY W. ANDERSEN	0.30	121.50	RESEARCH REGARDING PRESENTATION OF TREBLE DAMAGES ISSUES AT TRIAL.
6/21/2022	NICHOLAS F CODY	0.50	0.00	TELEPHONE CALL WITH ATTORNEYS ANDERSEN AND SMITH REGARDING RESPONSE TO STATE FARM'S MOTION FOR SUMMARY JUDGMENT.
6/21/2022	BRADLEY W. ANDERSEN	0.60	0.00	REVISE OUR STIPULATED MOTION AND ORDER TO EXTEND DEADLINE FOR REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT.
6/21/2022	BRADLEY W. ANDERSEN	1.80	0.00	REVIEW AND FINALIZE OUR RESPONSE BRIEF.
6/26/2022	BRADLEY W. ANDERSEN	1.20	0.00	REVIEW AND ANALYZE STATE FARM'S RESPONSE TO OUR MOTION FOR SUMMARY JUDGMENT.
6/27/2022	PRECIOUS M MILLER	6.00	0.00	REVIEW, ANALYZE AND EXTRACT MULTIPLE EXCERPTS FROM RELEVANT DEPOSITIONS (4.2); DRAFT AND FINALIZE BRAD ANDERSEN SECOND DECLARATION (1.1); FINALIZE AND STAMP EXHIBITS Q-S TO BRAD DECLARATION (.4); REVIEW

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				AND UPDATE RESPONSE EXHIBIT REFERENCES (.5).
6/27/2022	NICHOLAS F CODY	0.30	0.00	SEARCH FOR CASES ESTABLISHING STANDARD OF CARE BASED ON INSURER'S INTERNAL POLICIES.
6/27/2022	NICHOLAS F CODY	2.30	0.00	REVIEW AND REVISE REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT (1.9); TELEPHONE CALLS WITH ATTORNEY ANDERSEN REGARDING SAME (.4).
6/27/2022	BRADLEY W. ANDERSEN	0.90	0.00	DRAFT AND REVISE CLIENT DECLARATION.
6/27/2022	BRADLEY W. ANDERSEN	1.40	0.00	REVIEW THE DEPOSITIONS OF FUNK AND FORAKER TO INCORPORATE INTO OUR REPLY BRIEF.
6/27/2022	BRADLEY W. ANDERSEN	1.30	0.00	RESEARCH AND ANALYZE THE LAW REGARDING "HABIT EVIDENCE" UNDER ER 406.
6/27/2022	BRADLEY W. ANDERSEN	5.50	0.00	REVIEW AND REVISE REPLY IN SUPPORT OF OUR MOTION FOR SUMMARY JUDGMENT.
6/27/2022	BRADLEY W. ANDERSEN	1.20	0.00	DRAFT AND REVISE MY DECLARATION ATTACHING ADDITION DEPOSITIONS AND EXHIBITS.
7/26/2022	BRADLEY W. ANDERSEN	0.30	0.00	REVIEW BRAD'S MEMO ANALYZING ORDER DENYING OUR MOTION FOR SUMMARY JUDGMENT.
7/26/2022	BRADLEY W. ANDERSEN	0.20	0.00	REVIEW LOCAL COURT RULES ON TIMELINE FOR FILING MOTION FOR RECONSIDERATION.
7/26/2022	BRADLEY W. ANDERSEN	0.10	0.00	TELEPHONE CONFERENCE WITH CLIENT TO ADVISE HIM OF THE DECISION.
7/27/2022	NICHOLAS F CODY	0.50	0.00	CONFERENCE CALL WITH ATTORNEYS ANDERSEN AND SMITH REGARDING POTENTIAL MOTION FOR RECONSIDERATION.

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7/27/2022	BRADLEY W. ANDERSEN	0.70	0.00	TELEPHONE CONFERENCE WITH NICK CODY AND BRAD SMITH TO ANALYZE THE ORDER AND POSSIBLE MOTION FOR RECONSIDERATION.
7/27/2022	BRADLEY W. ANDERSEN	0.50	0.00	REVIEW AND ANALYZE THE COURTS SUMMARY JUDGMENT RULING TO ANALYZE POSSIBLE MOTION FOR RECONSIDERATION.
8/15/2022	BRADLEY W. ANDERSEN	0.80	0.00	PREPARE FOR AND CONFER WITH BRAD, DALE, AND ZACH ON NEXT STEPS WITH REGARD TO DENIAL OF OUR MOTION FOR SUMMARY JUDGMENT AND SETTLEMENT.
12/9/2022	BRADLEY W. ANDERSEN	0.80	340.00	TELEPHONE CONFERENCE WITH BRAD SMITH, DALE, AND ZACH WITH REGARD TO STATUS AND DISCUSS NEXT STEPS.
12/9/2022	PHILLIP J HABERTHUR	1.40	553.00	MEETING WITH BRAD ANDERSEN AND BRAD SMITH TO DISCUSS CASE AND SETTLEMENT DISCUSSIONS.
12/28/2022	HEATHER A DUMONT	0.20	0.00	DRAFT NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL.
1/2/2023	PHILLIP J HABERTHUR	0.20	85.00	CORRESPONDENCE WITH BRAD SMITH REGARDING TRIAL DATES (.1); REVIEW AND FINALIZE NOTICE OF SUBSTITUTION OF COUNSEL (.1).
1/5/2023	NICHOLAS F CODY	1.00	325.00	REVIEW AND REVISE JOINT STATUS REPORT ON CASE STATUS.
1/5/2023	PHILLIP J HABERTHUR	0.20	85.00	CORRESPONDENCE REGARDING TRIAL DATES FOR JOINT STATUS REPORT.
1/13/2023	PHILLIP J HABERTHUR	0.10	42.50	REVIEW COURT'S SCHEDULING ORDER FOR EXPERT DISCOVERY.
4/25/2023	HEATHER A DUMONT	0.30	0.00	FINALIZE AND E-MAIL CLERK DECLINATION OF CONSENT FORM.
5/15/2023	NICHOLAS F CODY	0.60	195.00	PREPARE FOR AND ATTEND STATUS CONFERENCE ON TRIAL SETTING (.4);

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INVOICE DATE: MAY 30, 2024

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				CORRESPONDENCE WITH ATTORNEY HABERTHUR CONCERNING SAME (.2).
5/15/2023	PHILLIP J HABERTHUR	0.20	85.00	CORRESPONDENCE WITH COURT REGARDING TRIAL DATES AND SCHEDULING CONFERENCE.
5/15/2023	PHILLIP J HABERTHUR	0.20	85.00	CORRESPONDENCE WITH BRAD SMITH REGARDING TRIAL SCHEDULING CONFERENCE.
5/16/2023	PHILLIP J HABERTHUR	0.20	85.00	REVIEW TRIAL SCHEDULING UPDATE AND CORRESPONDENCE WITH ZACH STOUMBOS REGARDING SAME.
5/18/2023	PHILLIP J HABERTHUR	0.20	85.00	CORRESPONDENCE WITH CLIENT REGARDING UPDATES ON TRIAL AND SETTLEMENT OFFER.
11/1/2023	HEATHER A DUMONT	0.10	0.00	EMAIL CLIENT ATTACHING ECF 69 DISCLOSURE OF EXPERT WITNESSES FILED BY PLAINTIFFS.
11/28/2023	PHILLIP J HABERTHUR	0.50	212.50	REVIEW EXPERT REPORT OF MS. LEONHARDI (.4); CORRESPONDENCE WITH BRAD SMITH REGARDING SAME (.1).
2/14/2024	JOSEPH VANCE	0.50	252.50	TELEPHONE CONFERENCE WITH PHIL HABERTHUR AND NICK CODY RE: BACKGROUND AND STRATEGY.
2/14/2024	NICHOLAS F CODY	0.50	187.50	TELEPHONE CALL WITH ATTORNEYS VANCE AND HABERTHUR CONCERNING TRIAL.
2/14/2024	PHILLIP J HABERTHUR	0.50	237.50	TELEPHONE CALL WITH NICK CODY AND JOE VANCE REGARDING CASE AND LITIGATION STRATEGY.
2/16/2024	JOSEPH VANCE	0.70	353.50	ANALYZE BACKGROUND PLEADINGS.
3/5/2024	AMANDA P BEATSON	0.80	0.00	RUN SEARCHES FOR EXPERT REPORTS AND DEPOSITION TRANSCRIPTS IN SHAREFILE AND IMANAGE. CREATE FOLDER OF THE SAME FOR ATTORNEY VANCE.

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DALE E. ANDERSON

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
3/5/2024	AMANDA P BEATSON	0.10	22.50	CONFERENCE CALL WITH JOE VANCE TO DISCUSS MISSING DEPOSITION TRANSCRIPTS AND EXPERT REPORTS.
3/5/2024	JOSEPH VANCE	4.30	2,171.50	ANALYZE BACKGROUND INFORMATION FOR PLAINTIFF'S PRETRIAL STATEMENT.
3/5/2024	JOSEPH VANCE	0.50	252.50	VIDEO CONFERENCE WITH PHIL HABERTHUR AND BRAD SMITH RE: TRIAL STRATEGY.
3/5/2024	PHILLIP J HABERTHUR	0.60	285.00	MEETING WITH JOE VANCE AND BRAD SMITH TO DISCUSS TRIAL PREPARATION.
3/5/2024	JASON M ROSENBAUM	0.50	162.50	COMMENCE TRIAL PREPARATION AND DRAFTING OF MOTIONS IN LIMINE AND JURY INSTRUCTIONS.
3/6/2024	AMANDA P BEATSON	0.30	0.00	CREATE DOCUMENT REQUEST LINK FOR DEPOSITION TRANSCRIPTS AND ENCLOSE LINK TO BRAD SMITH WITH REQUESTS FOR MISSING TRANSCRIPTS AND REPORT.
3/6/2024	AMANDA P BEATSON	0.10	0.00	RUN KEYWORD SEARCHES IN IMANAGE FOR EXPERT REPORTS.
3/6/2024	AMANDA P BEATSON	0.30	67.50	CONFIRM RECEIPT OF EXPERT REPORT FROM BRAD SMITH AND ORGANIZE EXPERT FILE. SEND UPDATED LINK TO JOE VANCE.
3/6/2024	COLLINGER A JOHNSON	0.40	50.00	DRAFT PLAINTIFFS' PRETRIAL STATEMENT.
3/6/2024	JOSEPH VANCE	1.30	656.50	DRAFT DEPOSITION SUMMARY.
3/6/2024	JOSEPH VANCE	1.50	757.50	DRAFT PRETRIAL STATEMENT.
3/6/2024	JOSEPH VANCE	0.30	151.50	VIDEO CALL WITH BRAD SMITH RE: PRETRIAL STATEMENT.
3/6/2024	JASON M ROSENBAUM	1.00	325.00	TELECONFERENCE AND E-MAILS WITH B.SMITH.
3/6/2024	JASON M ROSENBAUM	1.00	325.00	LEGAL RESEARCH RE: MOTIONS IN LIMINE.
3/8/2024	AMANDA P BEATSON	0.10	0.00	SEND THE CONDENSED CAROL FUNK DEPOSITION TRANSCRIPT TO BRAD SMITH.

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
3/8/2024	AMANDA P BEATSON	0.50	112.50	REVIEW PROPOSED TRIAL EXHIBIT LIST AND COMPARE TO DOCUMENTS IN SHAREFILE.
3/8/2024	JOSEPH VANCE	2.50	1,262.50	CONTINUE DRAFTING PRETRIAL STATEMENT.
3/8/2024	JASON M ROSENBAUM	2.50	812.50	DRAFT PROPOSED JURY INSTRUCTIONS AND MEMORANDUM RE: MOTIONS IN LIMINE.
3/8/2024	JASON M ROSENBAUM	0.50	162.50	LEGAL RESEARCH INTO LOCAL RULES.
3/11/2024	COLLINGER A JOHNSON	0.40	0.00	DRAFT & FINALIZE NOTICE OF ASSOCIATION OF COUNSEL FOR JOSEPH VANCE.
3/11/2024	AMANDA P BEATSON	0.50	0.00	OPEN CASE IN LEXBE. IDENTIFY AND UPLOAD DOCUMENTS INTO PLATFORM.
3/11/2024	AMANDA P BEATSON	0.20	45.00	CONFERENCE CALL WITH COLLINGER JOHNSON TO DISCUSS PRETRIAL STATEMENT AND EXHIBITS.
3/11/2024	AMANDA P BEATSON	2.00	450.00	IDENTIFY TRIAL EXHIBITS IN SHAREFILE AND LEXBE.
3/11/2024	JOSEPH VANCE	0.80	404.00	REVISE PRETRIAL STATEMENT.
3/11/2024	JASON M ROSENBAUM	3.50	1,137.50	DRAFT MEMORANDUM AND RESEARCH RE: MOTION IN LIMINE TOPICS.
3/11/2024	JASON M ROSENBAUM	3.00	975.00	DRAFT PROPOSED JURY INSTRUCTIONS.
3/12/2024	AMANDA P BEATSON	0.20	0.00	DOWNLOAD HIGHLIGHTED DEPOSITION TRANSCRIPTS FROM SECURE LINK, SAVE INTO SHAREFILE, AND SEND TO JOE VANCE FOR HIS REVIEW.
3/12/2024	COLLINGER A JOHNSON	0.40	50.00	CONTINUE WORKING ON PLAINTIFFS' PRETRIAL STATEMENT.
3/12/2024	JOSEPH VANCE	0.50	252.50	CONTINUE REVISING PRETRIAL STATEMENT.
3/12/2024	JASON M ROSENBAUM	1.50	487.50	REVISIONS TO EXHIBIT LIST AND REVIEW TRIAL EXHIBITS.
3/12/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS WITH CO-COUNSEL.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
3/13/2024	AMANDA P BEATSON	0.20	45.00	MEET WITH COLLINGER JOHNSON TO DISCUSS DESIGNATION OF DEPOSITION EXCERPTS.
3/13/2024	COLLINGER A JOHNSON	0.70	87.50	WORK ON PLAINTIFFS' PRETRIAL STATEMENT.
3/13/2024	JOSEPH VANCE	1.30	656.50	REVISE AND EDIT PRETRIAL STATEMENT.
3/13/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS WITH CO-COUNSEL RE: PRE-TRIAL STATEMENT.
3/14/2024	AMANDA P BEATSON	0.20	45.00	LOCATE PAPER CLAIM FILE EXHIBIT, EXTRACT FROM PRODUCTION, AND SAVE INTO TRIAL EXHIBIT FOLDER.
3/14/2024	AMANDA P BEATSON	0.30	67.50	REVIEW FILE FOR COURT REPORTER INFORMATION AND SEND FOLLOW UP E-MAIL TO COURT REPORTER TO REQUEST VIDEO OF PEGGY FORAKER'S DEPOSITION.
3/14/2024	COLLINGER A JOHNSON	0.60	75.00	WORK ON PLAINTIFFS' PRETRIAL STATEMENT.
3/14/2024	JOSEPH VANCE	1.40	707.00	ANALYZE DEPOSITION DESIGNATIONS.
3/14/2024	JOSEPH VANCE	0.20	101.00	TELEPHONE CONFERENCE WITH DEFENDANT'S ATTORNEY RE: MOTIONS IN LIMINE.
3/14/2024	JOSEPH VANCE	0.60	303.00	TELEPHONE CONFERENCE WITH BRAD SMITH RE: EXHIBITS AND PRETRIAL STATEMENT.
3/14/2024	JASON M ROSENBAUM	1.50	487.50	TELECONFERENCE WITH CO-COUNSEL RE: PRE-TRIAL STATEMENT AND REVIEW SAME.
3/15/2024	COLLINGER A JOHNSON	0.40	50.00	WORK ON PLAINTIFFS' PRETRIAL STATEMENT.
3/15/2024	COLLINGER A JOHNSON	0.20	25.00	COMMUNICATE WITH COURT REPORTER AND VIDEOGRAPHER TO OBTAIN VIDEOTAPED COPY OF JUNE 25, 2021 DEPOSITION OF PEGGY FORAKER.
3/15/2024	JOSEPH VANCE	0.80	404.00	REVIEW DEPOSITIONS IN PREPARATION FOR TRIAL.
3/15/2024	JOSEPH VANCE	0.70	353.50	CONTINUE REVISING PRETRIAL STATEMENT.
3/15/2024	JASON M ROSENBAUM	0.20	65.00	DRAFT JURY INSTRUCTIONS.

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3/18/2024	COLLINGER A JOHNSON	0.30	37.50	FINALIZE PLAINTIFFS' PRETRIAL STATEMENT.
3/18/2024	JOSEPH VANCE	1.50	757.50	DRAFT DEPOSITION SUMMARY IN PREPARATION FOR TRIAL.
3/18/2024	JOSEPH VANCE	0.70	353.50	REVISE AND FINALIZE PRETRIAL STATEMENT.
3/18/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS WITH CLIENT RE: TRIAL.
3/19/2024	JOSEPH VANCE	0.30	151.50	EXCHANGE COMMUNICATIONS WITH OPPOSING COUNSEL RE: PRETRIAL DEADLINES.
3/19/2024	JOSEPH VANCE	0.80	404.00	DRAFT DEPOSITION SUMMARY.
3/19/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS RE: UPCOMING TRIAL DATE.
3/21/2024	JOSEPH VANCE	0.20	101.00	REVIEW AND RESPOND TO COMMUNICATION FROM COURT RE: TRIAL SETTING.
3/21/2024	JASON M ROSENBAUM	0.20	65.00	E-MAIL WITH CLIENT.
3/25/2024	JASON M ROSENBAUM	3.00	975.00	DRAFT JOINT JURY INSTRUCTIONS.
3/26/2024	JASON M ROSENBAUM	0.50	162.50	CONTINUE DRAFTING JOINT JURY INSTRUCTIONS.
3/27/2024	JOSEPH VANCE	0.50	252.50	REVIEW AND COMMENT ON DRAFT JURY INSTRUCTIONS.
3/27/2024	JOSEPH VANCE	0.50	252.50	REVIEW DEFENDANT'S PRETRIAL STATEMENT.
3/27/2024	JOSEPH VANCE	0.30	151.50	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL RE: SCHEDULING ISSUES.
3/27/2024	JASON M ROSENBAUM	4.50	1,462.50	CONTINUE DRAFTING JOINT JURY INSTRUCTIONS AND REVIEW PATTERN JURY INSTRUCTIONS AND CASE LAW IN FURTHERANCE OF SAME.
3/28/2024	JOSEPH VANCE	0.20	101.00	TELEPHONE CONFERENCE WITH ZACH STOUMBOS RE: STRATEGY.
3/28/2024	JOSEPH VANCE	1.50	757.50	REVISE AND EDIT JURY INSTRUCTIONS.
3/28/2024	JOSEPH VANCE	0.50	252.50	REVIEW EMAIL FROM OPPOSING COUNSEL AND ANALYZE ISSUE OF DEPOSITION DESIGNATIONS.
3/28/2024	JASON M ROSENBAUM	0.80	260.00	CONTINUE DRAFTING JOINT JURY INSTRUCTIONS.

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DALE E. ANDERSON

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
3/28/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS WITH CO-COUNSEL RE: TRIAL PREPARATION.
3/29/2024	JOSEPH VANCE	0.50	252.50	REVIEW AND COMMENT ON DRAFT JURY INSTRUCTIONS.
3/29/2024	JOSEPH VANCE	0.10	50.50	DRAFT EMAIL TO OPPOSING COUNSEL RE: EVIDENTIARY ISSUE.
3/29/2024	JOSEPH VANCE	0.10	50.50	DRAFT EMAIL TO TEAM RE: TRIAL STATUS.
3/29/2024	JOSEPH VANCE	0.10	50.50	TELEPHONE CONFERENCE WITH BRAD SMITH RE: STRATEGY.
3/29/2024	JOSEPH VANCE	0.50	252.50	ATTEND STATUS CONFERENCE.
3/29/2024	JASON M ROSENBAUM	3.50	1,137.50	DRAFT AND REVISE JOINT JURY INSTRUCTIONS AND REVIEW PATTERN JURY INSTRUCTIONS AND CASE LAW IN FURTHERANCE OF SAME.
3/29/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS WITH CO-COUNSEL AND CLIENT.
4/1/2024	COLLINGER A JOHNSON	0.30	37.50	FINALIZE & FILE STIPULATION REGARDING ADMISSIBILITY OF EVIDENCE AND TESTIMONY.
4/1/2024	COLLINGER A JOHNSON	0.70	87.50	BEGIN DRAFTING TRIAL SUBPOENAS FOR FUNK AND STEWARD.
4/1/2024	JOSEPH VANCE	0.30	151.50	REVIEW AND COMMENT ON PROPOSED JURY INSTRUCTIONS.
4/1/2024	JOSEPH VANCE	0.50	252.50	REVIEW AND COMMENT ON STIPULATION.
4/1/2024	JASON M ROSENBAUM	0.80	260.00	DRAFT AND REVISE STIPULATION.
4/1/2024	JASON M ROSENBAUM	0.30	97.50	E-MAILS AND TELECONFERENCE WITH OPPOSING COUNSEL AND CO-COUNSEL RE: TRIAL.
4/1/2024	JASON M ROSENBAUM	0.80	260.00	DRAFT AND REVISE TRIAL SUBPOENAS.
4/1/2024	JASON M ROSENBAUM	1.60	520.00	REVIEW AND ANALYSIS OF DEPOSITION TRANSCRIPTS AND EXHIBITS IN PREPARATION FOR TRIAL.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/2/2024	COLLINGER A JOHNSON	0.20	25.00	DRAFT & FINALIZE NOTICE OF ASSOCIATION OF COUNSEL FOR JASON ROSENBAUM.
4/2/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS AND TELECONFERENCE WITH LEGAL ASSISTANT RE: STIPULATION E-FILING.
4/3/2024	JASON M ROSENBAUM	0.50	162.50	REVISIONS TO AND FILING OF NOTICE OF ASSOCIATION.
4/3/2024	JASON M ROSENBAUM	0.50	162.50	REVIEW AND ANALYSIS OF DEPOSITION TRANSCRIPTS AND EXHIBITS IN PREPARATION FOR TRIAL.
4/4/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS WITH OPPOSING COUNSEL RE: JURY INSTRUCTIONS.
4/4/2024	JASON M ROSENBAUM	0.80	260.00	REVIEW AND ANALYZE WASHINGTON AUTHORITIES RE: NEGLIGENT MISREPRESENTATION INSTRUCTIONS AND BURDEN OF PROOF.
4/8/2024	COLLINGER A JOHNSON	0.40	50.00	BEGIN DRAFTING PROPOSED PRETRIAL ORDER.
4/8/2024	JOSEPH VANCE	3.00	1,515.00	ANALYZE DEPOSITION TESTIMONY.
4/8/2024	JOSEPH VANCE	0.50	252.50	REVIEW JURY INSTRUCTIONS.
4/8/2024	JOSEPH VANCE	0.50	252.50	VIDEO CONFERENCE WITH BRAD SMITH AND JASON ROSENBAUM RE: TRIAL PREP AND STRATEGY.
4/8/2024	JASON M ROSENBAUM	0.50	162.50	DRAFT AND REVISE TRIAL SUBPOENAS.
4/8/2024	JASON M ROSENBAUM	1.00	325.00	DRAFT NOTICE TO ATTEND TRIAL.
4/8/2024	JASON M ROSENBAUM	1.00	325.00	DRAFT PROPOSED PRE-TRIAL ORDER.
4/8/2024	JASON M ROSENBAUM	1.00	325.00	REVIEW AND ANALYZE DEPOSITION TRANSCRIPTS AND EXHIBITS IN PREPARATION FOR TRIAL.
4/9/2024	AMANDA P BEATSON	0.20	45.00	RESEARCH FEDERAL SUBPOENA FEES AND FOLLOW UP WITH COLLINGER JOHNSON TO DISCUSS THE SAME.
4/9/2024	COLLINGER A JOHNSON	0.50	62.50	PREPARE TRIAL SUBPOENA OF CAROL FUNK.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/9/2024	COLLINGER A JOHNSON	0.60	75.00	WORK ON PROPOSED PRETRIAL ORDER.
4/9/2024	JOSEPH VANCE	2.30	1,161.50	ANALYZE EXHIBITS FOR TRIAL.
4/9/2024	JOSEPH VANCE	2.00	1,010.00	REVIEW AND REVISE PRETRIAL ORDER.
4/9/2024	JOSEPH VANCE	0.60	303.00	EXCHANGE COMMUNICATIONS WITH BRAD SMITH RE: STRATEGY.
4/9/2024	JOSEPH VANCE	0.50	252.50	ANALYZE STATE FARM'S PROPOSED JURY INSTRUCTIONS.
4/9/2024	JOSEPH VANCE	0.50	252.50	CONFERENCE WITH DALE AND LETA ANDERSON RE: STATUS AND STRATEGY.
4/9/2024	JASON M ROSENBAUM	0.70	227.50	CONTINUE DRAFTING PROPOSED PRE-TRIAL ORDER.
4/9/2024	JASON M ROSENBAUM	2.00	650.00	REVIEW TRIAL EXHIBITS AND DEPOSITION EXCERPTS IN PREPARATION FOR TRIAL.
4/9/2024	JASON M ROSENBAUM	0.30	97.50	E-MAILS WITH CO-COUNSEL RE: TRIAL PREPARATION.
4/9/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS WITH OPPOSING COUNSEL.
4/10/2024	JOSEPH VANCE	0.50	252.50	REVISE STIPULATED FACTS.
4/10/2024	JOSEPH VANCE	0.50	252.50	REVIEW AND REVISE EXHIBIT LIST.
4/10/2024	JOSEPH VANCE	1.50	757.50	RESEARCH ISSUES RELATED TO JURY INSTRUCTIONS.
4/10/2024	JOSEPH VANCE	3.50	1,767.50	REVISE AND EDIT JURY INSTRUCTIONS.
4/10/2024	JOSEPH VANCE	1.00	505.00	EXCHANGE COMMUNICATIONS WITH BRAD SMITH AND JASON ROSENBAUM RE: TRIAL STRATEGY.
4/10/2024	JOSEPH VANCE	1.50	757.50	PREPARE FOR AND ATTEND PRE-TRIAL CONFERENCE WITH OPPOSING COUNSEL.
4/10/2024	PHILLIP J HABERTHUR	0.60	285.00	TELEPHONE CALL WITH BRAD ANDERSEN TO DISCUSS BACKGROUND OF CASE AND TRIAL PREPARATION.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/10/2024	JASON M ROSENBAUM	1.00	325.00	TELECONFERENCE AND E-MAILS WITH B.SMITH AND J.VANCE RE: TRIAL STRATEGY.
4/10/2024	JASON M ROSENBAUM	4.00	1,300.00	DRAFT AND REVISE PROPOSED JOINT AND DISPUTED JURY INSTRUCTIONS.
4/10/2024	JASON M ROSENBAUM	1.50	487.50	REVIEW AND ANALYZE COURT RULES AND FILE IN PREPARATION FOR TRIAL.
4/10/2024	JASON M ROSENBAUM	1.50	487.50	PREPARE FOR AND ATTEND PRE-TRIAL CONFERENCE WITH OPPOSING COUNSEL.
4/11/2024	COLLINGER A JOHNSON	0.10	12.50	CONTINUE PREPARING SUBPOENA OF STEVEN MCALISTER.
4/11/2024	JOSEPH VANCE	0.20	101.00	EXCHANGE EMAILS WITH COURT CLERK RE: TRIAL.
4/11/2024	JOSEPH VANCE	0.40	202.00	ANALYZE AND RESPOND TO LOGISTICAL ISSUES FOR TRIAL.
4/11/2024	JOSEPH VANCE	1.80	909.00	CONTINUE REVISING AND EDITING JURY INSTRUCTIONS.
4/11/2024	JASON M ROSENBAUM	2.00	650.00	DRAFT AND REVISE PROPOSED JOINT AND DISPUTED JURY INSTRUCTIONS.
4/11/2024	JASON M ROSENBAUM	0.30	97.50	E-MAILS WITH CO-COUNSEL AND ATTORNEY VANCE RE: JURY INSTRUCTIONS.
4/11/2024	JASON M ROSENBAUM	2.00	650.00	DRAFT TRIAL BRIEF AND VOIR DIRE STATEMENT.
4/11/2024	JASON M ROSENBAUM	0.20	65.00	E-MAIL WITH COURT STAFF RE: COURTROOM TRAINING.
4/12/2024	COLLINGER A JOHNSON	0.20	25.00	WORK ON PRETRIAL ORDER.
4/12/2024	JOSEPH VANCE	0.50	252.50	EXCHANGE COMMUNICATIONS WITH PLAINTIFF'S COUNSEL RE: PRETRIAL PLEADINGS.
4/12/2024	JOSEPH VANCE	0.70	353.50	REVISE AND EDIT JURY INSTRUCTIONS.
4/12/2024	JOSEPH VANCE	0.60	303.00	EXCHANGE COMMUNICATIONS WITH BRAD SMITH RE: STRATEGY.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/12/2024	JOSEPH VANCE	0.60	303.00	REVISE AND EDIT TRIAL BRIEF.
4/12/2024	JASON M ROSENBAUM	5.00	1,625.00	DRAFT NEUTRAL STATEMENT, VOIR DIRE QUESTIONS, AND TRIAL BRIEF.
4/14/2024	JASON M ROSENBAUM	5.00	1,625.00	DRAFT AND REVISE TRIAL BRIEF AND JURY INSTRUCTIONS.
4/15/2024	COLLINGER A JOHNSON	1.10	137.50	WORK ON PRETRIAL ORDER AND ACCOMPANYING PLEADINGS.
4/15/2024	JOSEPH VANCE	4.20	2,121.00	REVISE AND EDIT TRIAL BRIEF, JURY INSTRUCTIONS, AND PRETRIAL ORDER.
4/15/2024	JOSEPH VANCE	0.80	404.00	EXCHANGE COMMUNICATIONS WITH STATE FARM'S ATTORNEY RE: JURY INSTRUCTIONS AND PRETRIAL ORDER.
4/15/2024	JASON M ROSENBAUM	2.00	650.00	DRAFT, REVISE, AND FINALIZE JURY INSTRUCTIONS.
4/15/2024	JASON M ROSENBAUM	1.50	487.50	DRAFT, REVISE, AND FINALIZE TRIAL BRIEF.
4/15/2024	JASON M ROSENBAUM	0.50	162.50	DRAFT, REVISE, AND FINALIZE NEUTRAL STATEMENT.
4/15/2024	JASON M ROSENBAUM	0.50	162.50	DRAFT, REVISE, AND FINALIZE VOIR DIRE.
4/15/2024	JASON M ROSENBAUM	0.50	162.50	DRAFT, REVISE, AND FINALIZE PRE-TRIAL ORDER.
4/15/2024	JASON M ROSENBAUM	0.50	162.50	TELECONFERENCE AND E-MAILS WITH CO-COUNSEL AND DEFENDANT'S COUNSEL RE: TRIAL.
4/15/2024	JASON M ROSENBAUM	1.50	487.50	REVIEW AND ANALYZE WASHINGTON AUTHORITIES AND PLEADINGS RE: NONECONOMIC DAMAGES.
4/16/2024	AMANDA P BEATSON	0.20	0.00	CONFERENCE CALL WITH JOE VANCE REGARDING TRIAL DIRECTOR AND DEPOSITION VIDEO OF PEGGY FORAKER.
4/16/2024	AMANDA P BEATSON	0.10	22.50	FOLLOW UP WITH COLLINGER JOHNSON AND CURTIS CHRISTENSEN REGARDING SPLICING OF VIDEO FOR TRIAL.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/17/2024	COLLINGER A JOHNSON	1.60	200.00	EDIT VIDEO DEPOSITION OF PEGGY FORAKER.
4/18/2024	COLLINGER A JOHNSON	0.30	37.50	WORK ON TRIAL SUBPOENA FOR RICHARD STEWART.
4/18/2024	JOSEPH VANCE	0.20	101.00	EXCHANGE COMMUNICATIONS WITH COURT CLERK RE: LOGISTICS OF PRETRIAL CONFERENCE.
4/18/2024	JOSEPH VANCE	0.50	252.50	VIDEO CONFERENCE WITH BRAD SMITH AND JASON ROSENBAUM RE: TRIAL STRATEGY.
4/18/2024	JOSEPH VANCE	1.50	757.50	REVIEW EDITED FORAKER DEPOSITION.
4/18/2024	JASON M ROSENBAUM	0.50	162.50	TELECONFERENCE WITH B.SMITH AND J.VANCE RE: TRIAL PREPARATION.
4/18/2024	JASON M ROSENBAUM	2.50	812.50	REVIEW AND ANALYZE DEPOSITION TRANSCRIPTS AND EXHIBITS IN PREPARATION FOR TRIAL.
4/19/2024	COLLINGER A JOHNSON	0.90	112.50	PREPARE INDEX TO CROSS-REFERENCE TRIAL EXHIBITS WITH DEPOSITION EXHIBITS.
4/19/2024	COLLINGER A JOHNSON	0.30	37.50	WORK ON TRIAL SUBPOENA OF RICHARD STEWART.
4/19/2024	JOSEPH VANCE	3.50	1,767.50	SUMMARIZE DEPOSITION TRANSCRIPTS FOR TRIAL AND ANALYZE TRIAL EXHIBITS.
4/19/2024	JASON M ROSENBAUM	2.50	812.50	REVIEW AND ANALYZE TRIAL EXHIBITS AND DEPOSITIONS IN PREPARATION FOR TRIAL.
4/19/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS WITH J.VANCE AND LEGAL ASSISTANT RE: TRIAL SUBPOENAS.
4/22/2024	JOSEPH VANCE	1.50	757.50	OUTLINE ISSUES FOR TRIAL.
4/22/2024	JOSEPH VANCE	0.50	252.50	ANALYZE ISSUES RELATED TO PRETRIAL CONFERENCE.
4/22/2024	JOSEPH VANCE	0.70	353.50	ANALYZE ISSUES RELATED TO JURY SELECTION AND VERDICT AND EXCHANGE COMMUNICATIONS WITH BRAD SMITH RE: SAME.

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EXHIBIT A
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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/22/2024	JOSEPH VANCE	0.30	151.50	EXCHANGE COMMUNICATIONS WITH OPPOSING COUNSEL RE: LOGISTICS FOR TRIAL.
4/22/2024	JOSEPH VANCE	0.20	101.00	EXCHANGE COMMUNICATIONS WITH COURT RE: PRETRIAL CONFERENCE.
4/22/2024	JASON M ROSENBAUM	2.50	812.50	REVIEW AND ANALYZE DEPOSITION TRANSCRIPTS, TRIAL EXHIBITS, AND EXPERT REPORTS IN PREPARATION FOR TRIAL.
4/22/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS WITH B.SMITH AND J.VANCE RE: STEWART TRIAL SUBPOENA.
4/22/2024	JASON M ROSENBAUM	2.00	650.00	REVIEW AND ANALYZE WASHINGTON AND FEDERAL AUTHORITIES RE: FEDERAL RULE OF CIVIL PROCEDURE 48 AND JURORS.
4/23/2024	JOSEPH VANCE	3.50	1,767.50	DRAFT WITNESS OUTLINES FOR TRIAL.
4/23/2024	JASON M ROSENBAUM	2.00	650.00	REVIEW PLEADINGS, EXHIBITS, AND DEPOSITION TRANSCRIPTS IN PREPARATION FOR TRIAL.
4/24/2024	AMANDA P BEATSON	0.40	0.00	SET UP TRIAL DIRECTOR FOR CASE AND DRAFT TRIAL DIRECTOR INDEX.
4/24/2024	COLLINGER A JOHNSON	1.40	175.00	FURTHER EDITS TO VIDEOTAPED DEPOSITION OF PEGGY FORAKER.
4/24/2024	JOSEPH VANCE	1.30	656.50	DRAFT WITNESS OUTLINES FOR TRIAL.
4/24/2024	JASON M ROSENBAUM	1.50	487.50	DRAFT TRIAL CHECKLIST AND REVIEW AND ANALYZE FILE IN PREPARATION FOR TRIAL.
4/24/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS WITH STAFF AND CALL COURT STAFF RE: TRIAL ISSUES.
4/25/2024	COLLINGER A JOHNSON	0.70	87.50	PREPARE EXHIBITS FOR TRIAL.
4/25/2024	JOSEPH VANCE	0.60	303.00	REVIEW PRETRIAL CONFERENCE AGENDA.
4/25/2024	JOSEPH VANCE	3.50	1,767.50	PREPARE WITNESS OUTLINES.
4/25/2024	JOSEPH VANCE	2.00	1,010.00	PREPARE DALE AND LETA ANDERSON FOR TRIAL TESTIMONY.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/25/2024	JASON M ROSENBAUM	0.50	162.50	MULTIPLE E-MAILS WITH B.SMITH RE: TRIAL STRATEGY.
4/25/2024	JASON M ROSENBAUM	0.20	65.00	E-MAIL WITH OPPOSING COUNSEL.
4/25/2024	JASON M ROSENBAUM	0.20	65.00	E-MAIL WITH COURT STAFF.
4/25/2024	JASON M ROSENBAUM	1.00	325.00	REVIEW AND ANALYZE DEPOSITION TRANSCRIPTS AND TRIAL EXHIBITS IN PREPARATION FOR TRIAL.
4/26/2024	JOSEPH VANCE	1.50	757.50	PREPARE FOR AND ATTEND PRETRIAL CONFERENCE.
4/26/2024	JOSEPH VANCE	4.00	2,020.00	TRAVEL TO AND FROM PRETRIAL CONFERENCE IN TACOMA.
4/26/2024	JOSEPH VANCE	1.50	757.50	ANALYZE LEGAL ISSUES FOR PRETRIAL CONFERENCE.
4/27/2024	JASON M ROSENBAUM	0.40	130.00	E-MAILS AND REVIEW AND ANALYZE WASHINGTON AUTHORITIES RE: RESPONSE TO MOTION IN LIMINE.
4/29/2024	COLLINGER A JOHNSON	2.60	325.00	CONTINUE PREPARING EXHIBITS FOR TRIAL.
4/29/2024	JOSEPH VANCE	0.30	151.50	EXCHANGE COMMUNICATIONS WITH OPPOSING COUNSEL RE: TRIAL ISSUES.
4/29/2024	JASON M ROSENBAUM	2.00	650.00	DRAFT RESPONSE TO MOTION IN LIMINE.
4/30/2024	JASON M ROSENBAUM	4.00	1,300.00	CONTINUE DRAFTING RESPONSE TO MOTION IN LIMINE.
4/30/2024	JASON M ROSENBAUM	0.70	227.50	NUMEROUS E-MAILS WITH B.SMITH AND COURT RE: TRIAL PREPARATION.
4/30/2024	JASON M ROSENBAUM	1.50	487.50	COMPILE HORNBOOKS, RULES ON EVIDENCE, AND OTHER REFERENCES FOR USE AT TRIAL.
4/30/2024	COLLINGER A JOHNSON	0.90	0.00	PREPARE COURT COPIES OF USB AND TRIAL EXHIBIT BINDER.
4/30/2024	AMANDA P BEATSON	0.20	0.00	REVIEW TRIAL DIRECTOR'S ACCEPTED FILE TYPES AND FOLLOW UP WITH COLLINGER JOHNSON REGARDING THE SAME.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

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MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
4/30/2024	COLLINGER A JOHNSON	0.80	100.00	CONTINUE PREPARING EXHIBITS FOR TRIAL.
4/30/2024	JOSEPH VANCE	0.50	252.50	ANALYZE MOTION IN LIMINE AND REVIEW AND COMMENT ON RESPONSE TO SAME.
4/30/2024	JOSEPH VANCE	6.70	3,383.50	DRAFT TRIAL WITNESS OUTLINES.
5/1/2024	JASON M ROSENBAUM	5.00	1,625.00	DRAFT AND REVISE BRIEF AND DECLARATION IN OPPOSITION TO DEFENDANT'S MOTION IN LIMINE.
5/1/2024	JASON M ROSENBAUM	0.50	162.50	MULTIPLE E-MAILS WITH CO-COUNSEL AND OPPOSING COUNSEL RE: TRIAL.
5/1/2024	JASON M ROSENBAUM	0.50	162.50	TELECONFERENCE WITH CO-COUNSEL RE: TRIAL PREPARATION.
5/1/2024	AMANDA P BEATSON	0.30	67.50	CONFERENCE CALL WITH COLLINGER JOHNSON TO DISCUSS TRIAL PREPARATION AND REQUIRED MATERIALS.
5/1/2024	COLLINGER A JOHNSON	1.30	162.50	WORK ON RESPONSE TO MOTION IN LIMINE AND DECLARATION OF JASON ROSENBAUM, EXHIBITS TO THE SAME.
5/1/2024	COLLINGER A JOHNSON	2.50	312.50	CONTINUE PREPARING EXHIBITS, BINDERS, USB, AND OTHER DOCUMENTS FOR TRIAL.
5/1/2024	JOSEPH VANCE	2.30	1,161.50	DRAFT WITNESS OUTLINES FOR TRIAL.
5/1/2024	JOSEPH VANCE	0.80	404.00	VIDEO CONFERENCE WITH BRAD SMITH AND JASON ROSENBAUM RE: TRIAL STRATEGY.
5/1/2024	JOSEPH VANCE	0.70	353.50	REVIEW VOIR DIRE QUESTIONS AND EXCHANGE COMMUNICATIONS WITH STATE FARM ATTORNEY RE: SAME.
5/1/2024	JOSEPH VANCE	0.20	101.00	REVIEW PRETRIAL ORDER.
5/1/2024	JOSEPH VANCE	0.30	151.50	EXCHANGE COMMUNICATIONS WITH COURT CLERK RE: TRIAL LOGISTICS.
5/1/2024	JOSEPH VANCE	1.50	757.50	REVISE AND EDIT RESPONSE TO MOTION IN LIMINE.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/2/2024	JASON M ROSENBAUM	2.50	812.50	DRAFT, REVISE, AND FINALIZE OPPOSITION TO DEFENDANT'S MOTION IN LIMINE.
5/2/2024	JASON M ROSENBAUM	0.50	162.50	E-MAILS WITH CO-COUNSEL AND OPPOSING COUNSEL RE: TRIAL EXHIBITS.
5/2/2024	COLLINGER A JOHNSON	1.00	125.00	FINALIZE RESPONSE TO MOTION IN LIMINE, ROSENBAUM DECLARATION, AND EXHIBITS TO THE SAME.
5/2/2024	COLLINGER A JOHNSON	0.90	112.50	UPDATE EXHIBITS & POTENTIAL REBUTTAL EXHIBITS FOR TRIAL.
5/2/2024	JOSEPH VANCE	0.70	353.50	EXCHANGE COMMUNICATIONS WITH BRAD SMITH AND JASON ROSENBAUM RE: TRIAL.
5/2/2024	JOSEPH VANCE	1.00	505.00	REVISE AND UPDATE WITNESS OUTLINES.
5/3/2024	JASON M ROSENBAUM	3.00	675.00	ATTEND IN-PERSON COURTROOM TRAINING AT WESTERN DISTRICT COURTHOUSE IN TACOMA.
5/3/2024	JASON M. ROSENBAUM	5.00	1,125.00	TRAVEL FROM LANDERHOLM OFFICE TO AND FROM U.S. DISTRICT COURT IN TACOMA TO ATTEND COURTROOM TRAINING.
5/3/2024	COLLINGER A JOHNSON	1.10	0.00	FINALIZE EXHIBITS, BINDERS, & USBS FOR TRIAL.
5/3/2024	JOSEPH VANCE	0.20	101.00	TELEPHONE CONFERENCE WITH DALE ANDERSON RE: TRIAL.
5/4/2024	JASON M ROSENBAUM	0.50	162.50	MULTIPLE E-MAILS WITH B.SMITH AND J.VANCE RE: TRIAL.
5/4/2024	JOSEPH VANCE	2.50	1,262.50	REVISE WITNESS OUTLINES AND EXCHANGE COMMUNICATIONS WITH BRAD SMITH RE: SAME.
5/5/2024	JASON M ROSENBAUM	0.50	162.50	CONFERENCE WITH CLIENTS AND CO-COUNSEL RE: TRIAL STRATEGY.
5/5/2024	JASON M ROSENBAUM	2.00	450.00	TRAVEL TO TACOMA, WASHINGTON FOR TRIAL.
5/5/2024	JOSEPH VANCE	0.50	252.50	CONFER WITH BRAD SMITH AND JASON ROSENBAUM FOR TRIAL PREPARATION.

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/5/2024	JOSEPH VANCE	0.20	101.00	CONFER WITH DALE ANDERSON FOR TRIAL PREPARATION.
5/5/2024	JOSEPH VANCE	2.00	1,010.00	TRAVEL TO TACOMA FOR TRIAL.
5/6/2024	JASON M ROSENBAUM	0.50	162.50	CONFERENCES WITH CLIENTS AND CO-COUNSEL RE: TRIAL STRATEGY.
5/6/2024	JASON M ROSENBAUM	1.00	325.00	TRIAL PREPARATIONS.
5/6/2024	JASON M ROSENBAUM	8.00	1,800.00	ATTEND DAY 1 OF TRIAL AT U.S. COURTHOUSE IN TACOMA.
5/6/2024	JOSEPH VANCE	1.00	505.00	ANALYZE SECTIONS OF STEWARD DEPOSITION TO BE READ AT TRIAL AND EXCHANGE COMMUNICATIONS WITH STATE FARM ATTORNEY RE: SAME.
5/6/2024	JOSEPH VANCE	0.50	252.50	DEBRIEF WITH CLIENTS AND BRAD SMITH AND JASON ROSENBAUM.
5/6/2024	JOSEPH VANCE	8.00	4,040.00	ATTEND TRIAL.
5/6/2024	JOSEPH VANCE	1.00	505.00	PREPARE FOR TRIAL.
5/7/2024	JASON M ROSENBAUM	2.50	562.50	TRAVEL FROM TACOMA TO LANDERHOLM OFFICE.
5/7/2024	JASON M ROSENBAUM	1.00	325.00	PREPARE FOR TRIAL.
5/7/2024	JASON M ROSENBAUM	0.20	65.00	CORRESPONDENCE WITH COURT STAFF REGARDING TRIAL DELAY.
5/7/2024	JASON M ROSENBAUM	0.30	97.50	CONFERENCE WITH B.SMITH RE: TRIAL DELAY.
5/7/2024	JASON M ROSENBAUM	4.00	900.00	ATTEND SECOND DAY OF TRIAL AT U.S. COURTHOUSE IN TACOMA.
5/7/2024	JOSEPH VANCE	2.00	1,010.00	TRAVEL FROM TACOMA.
5/7/2024	JOSEPH VANCE	0.70	353.50	EXCHANGE COMMUNICATIONS WITH CLIENT, OPPOSING COUNSEL AND CO-COUNSEL RE: LOGISTICS AND WITNESSES WITH TRIAL BEING POSTPONED.
5/7/2024	JOSEPH VANCE	0.50	252.50	REVISE WITNESS OUTLINE.

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/7/2024	JOSEPH VANCE	3.50	1,767.50	ATTEND TRIAL.
5/7/2024	JOSEPH VANCE	0.50	252.50	PREPARE FOR TRIAL.
5/8/2024	JASON M ROSENBAUM	0.50	162.50	DRAFT POWERPOINT PRESENTATION FOR CLOSING ARGUMENT.
5/8/2024	JASON M ROSENBAUM	0.20	65.00	CORRESPONDENCE WITH B.SMITH RE: CLOSING ARGUMENT..
5/8/2024	COLLINGER A JOHNSON	0.50	62.50	PREPARE PRESENTATION MATERIALS FOR CLOSING ARGUMENTS.
5/8/2024	JOSEPH VANCE	0.60	303.00	REVIEW AND COMMENT ON SLIDES FOR CLOSING ARGUMENT.
5/9/2024	JASON M ROSENBAUM	0.30	97.50	E-MAILS WITH B.SMITH AND J.VANCE RE: TRIAL PREPARATION.
5/9/2024	JOSEPH VANCE	0.20	101.00	EXCHANGE COMMUNICATIONS WITH BRAD SMITH RE: STRATEGY.
5/9/2024	JOSEPH VANCE	0.10	50.50	EXCHANGE COMMUNICATIONS WITH COURT CLERK RE: TRIAL.
5/9/2024	JOSEPH VANCE	0.20	101.00	REVIEW PROPOSED VERDICT FORM.
5/9/2024	JOSEPH VANCE	0.20	101.00	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL RE: TRIAL LOGISTICS.
5/10/2024	JASON M ROSENBAUM	0.50	162.50	RECEIVE, REVIEW, AND REVISE PROPOSED SPECIAL VERDICT FORM.
5/10/2024	JASON M ROSENBAUM	0.30	97.50	DRAFT AND REVISE CLOSING POWERPOINT.
5/10/2024	JASON M ROSENBAUM	0.20	65.00	E-MAILS WITH B.SMITH AND J.VANCE RE: TRIAL.
5/10/2024	JOSEPH VANCE	3.80	1,919.00	REVISE WITNESS OUTLINE.
5/10/2024	JOSEPH VANCE	0.70	353.50	REVIEW AND COMMENT ON SLIDES FOR CLOSING ARGUMENT.
5/11/2024	COLLINGER A JOHNSON	0.70	87.50	CONTINUE PREPARING CLOSING ARGUMENT PRESENTATION MATERIALS.

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024
INVOICE NUM.: XXXXXX
MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/12/2024	JASON M ROSENBAUM	2.50	562.50	TRAVEL FROM LANDERHOLM OFFICE TO U.S. DISTRICT COURT IN TACOMA.
5/12/2024	JOSEPH VANCE	2.50	1,262.50	TRAVEL TO TACOMA FOR TRIAL.
5/13/2024	JASON M ROSENBAUM	1.50	487.50	REVIEW AND ANALYZE WASHINGTON AUTHORITIES RE: DISCRETE ISSUES RAISED BY JUDGE WITH RESPECT TO PLAINTIFF'S MOTION.
5/13/2024	JASON M ROSENBAUM	0.50	162.50	PREPARATIONS FOR TRIAL.
5/13/2024	JASON M ROSENBAUM	8.00	1,800.00	ATTEND DAY 3 OF TRIAL AT U.S. DISTRICT COURT IN TACOMA.
5/13/2024	JOSEPH VANCE	1.50	757.50	ANALYZE ISSUES RELATED TO 30(B)(6) TESTIMONY AND JURY INSTRUCTIONS.
5/13/2024	JOSEPH VANCE	8.00	4,040.00	ATTEND TRIAL.
5/13/2024	JOSEPH VANCE	1.00	505.00	PREPARE FOR TRIAL.
5/14/2024	JASON M ROSENBAUM	1.70	552.50	DRAFT CONFORMED JURY INSTRUCTIONS AND SPECIAL VERDICT FORM PER COURT'S INSTRUCTIONS.
5/14/2024	JASON M ROSENBAUM	0.30	97.50	MULTIPLE E-MAILS WITH CO-COUNSEL AND OPPOSING COUNSEL RE: CONFORMED JURY INSTRUCTIONS AND VERDICT FORM.
5/14/2024	JASON M ROSENBAUM	8.00	1,800.00	ATTEND DAY 4 OF TRIAL AT U.S. DISTRICT COURT IN TACOMA.
5/14/2024	JASON M ROSENBAUM	1.50	487.50	PREPARATIONS FOR TRIAL.
5/14/2024	JOSEPH VANCE	1.40	707.00	REVIEW AND COMMENT ON FINAL JURY INSTRUCTIONS.
5/14/2024	JOSEPH VANCE	8.00	4,040.00	ATTEND TRIAL.
5/14/2024	JOSEPH VANCE	2.30	1,161.50	ANALYZE ISSUES RELATED TO JURY INSTRUCTION AND TESTIMONY FROM 30(B)(6) WITNESS AND EXCHANGE COMMUNICATIONS WITH STATE FARM'S ATTORNEY RE: SAME.

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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/14/2024	NICHOLAS F CODY	0.40	150.00	TELEPHONE CALLS AND RESEARCH WITH ATTORNEY VANCE REGARDING JURY INSTRUCTION ISSUES.
5/15/2024	JASON M ROSENBAUM	2.50	562.50	TRAVEL FROM U.S. DISTRICT COURT IN TACOMA TO LANDERHOLM OFFICE IN VANCOUVER.
5/15/2024	JASON M ROSENBAUM	1.50	487.50	PREPARE FOR TRIAL.
5/15/2024	JASON M ROSENBAUM	6.20	1,395.00	ATTEND DAY 5 OF TRIAL AT U.S. DISTRICT COURT IN TACOMA.
5/15/2024	JOSEPH VANCE	2.30	1,161.50	TRAVEL FROM TACOMA.
5/15/2024	JOSEPH VANCE	6.20	3,131.00	ATTEND TRIAL.
5/15/2024	JOSEPH VANCE	0.70	353.50	REVIEW AND FINALIZE FINAL JURY INSTRUCTIONS.
5/16/2024	JASON M ROSENBAUM	5.50	1,787.50	REVIEW AND ANALYZE WASHINGTON AUTHORITIES RE: PREJUDGMENT INTEREST, MOTIONS FOR REASONABLE ATTORNEYS' FEES AND COSTS, TYPES OF RECOVERABLE COSTS UNDER CONSUMER PROTECTION ACT AND BAD FAITH, TAXABLE COSTS, AND TIMING AND PROCEDURE OF ENTRY OF JUDGMENT.
5/16/2024	JASON M ROSENBAUM	0.30	97.50	RECEIVE AND REVIEW JUDGMENT.
5/16/2024	JASON M ROSENBAUM	0.70	227.50	MULTIPLE E-MAILS AND STRATEGIZE WITH B.SMITH AND J.VANCE RE: MOTION FOR PREJUDGMENT INTEREST, ATTORNEYS' FEES AND COSTS.
5/17/2024	JASON M ROSENBAUM	0.90	292.50	REVIEW AND ANALYZE WASHINGTON AUTHORITIES RE: EQUITABLE BASIS FOR RECOVERY OF NONTAXABLE COSTS.
5/17/2024	JASON M ROSENBAUM	0.60	195.00	CONFERENCE AND MULTIPLE E-MAILS TO DISCUSS STRATEGY FOR MOTION FOR PREJUDGMENT INTEREST, ATTORNEYS' FEES AND NONTAXABLE COSTS.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/17/2024	NICHOLAS F CODY	0.80	300.00	PREPARE OUTLINE OF PETITION FOR ATTORNEY FEES AND COSTS AND MOTION TO AMEND JUDGMENT (.6); CORRESPONDENCE WITH ATTORNEYS VANCE AND ROSENBAUM REGARDING SAME (.2).
5/17/2024	NICHOLAS F CODY	0.90	337.50	TELEPHONE CALL WITH ATTORNEYS VANCE AND ROSENBAUM REGARDING PETITION FOR ATTORNEY FEES [.4]; CONTINUED ANALYSIS OF COMPENSABLE COSTS AND CORRESPONDENCE REGARDING SAME [.5].
5/17/2024	NICHOLAS F CODY	1.30	487.50	CONTINUED ANALYSIS REGARDING PETITION FOR ATTORNEY FEES AND COSTS (1.0); CORRESPONDENCE WITH ATTORNEYS VANCE AND ROSENBAUM CONCERNING SAME (.3).
5/17/2024	JOSEPH VANCE	0.30	151.50	EXCHANGE COMMUNICATIONS WITH POTENTIAL EXPERT IN SUPPORT OF FEE PETITION.
5/17/2024	JOSEPH VANCE	1.50	757.50	ANALYZE LEGAL ISSUES FOR FEE PETITION.
5/20/2024	JASON M ROSENBAUM	0.50	162.50	REVIEW BILLING ENTRIES AND INTERNAL CORRESPONDENCE REGARDING ATTORNEYS' FEES, COSTS AND EXPENSES.
5/20/2024	JASON M ROSENBAUM	7.00	2,275.00	DRAFT MOTION TO AMEND JUDGMENT TO INCLUDE TREBLE DAMAGES AND PREJUDGMENT INTEREST, AND FOR AN AWARD OF ATTORNEYS' FEES AND NONTAXABLE COSTS.
5/20/2024	HEATHER A DUMONT	0.20	0.00	COMPILE FEES AND COSTS RELATING TO TREJO CASE IN EXCEL SHEET FOR ATTORNEY USE FOR FEE PETITION.
5/20/2024	HEATHER A DUMONT	1.00	0.00	COMPILE VENDOR INVOICES SENT DIRECTLY TO CLIENT FOR INCLUSION IN FEE PETITION.
5/20/2024	HEATHER A DUMONT	0.20	0.00	COMPILE FEES AND COSTS IN EXCEL SHEET FOR ATTORNEY USE FOR FEE PETITION.
5/20/2024	NICHOLAS F CODY	2.40	900.00	INITIAL REVIEW AND REVISION TO LANDERHOLM FEE ITEMIZATIONS IN PREPARATION FOR

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				ATTORNEY FEE PETITION (2.1); CORRESPONDENCE WITH ATTORNEYS VANCE AND ROSENBAUM REGARDING SAME (.3).
5/20/2024	NICHOLAS F CODY	0.50	187.50	MULTIPLE CALL WITH ATTORNEY VANCE REGARDING FEE PETITION (.4); CORRESPONDENCE REGARDING SAME (.1).
5/20/2024	JOSEPH VANCE	0.40	202.00	EXCHANGE COMMUNICATIONS WITH PHIL TALMADGE RE: SUPPORT OF FEE PETITION.
5/20/2024	JOSEPH VANCE	0.20	101.00	EXCHANGE EMAILS WITH DALE ANDERSON RE: STRATEGY.
5/20/2024	JOSEPH VANCE	0.60	303.00	ANALYZE ISSUES RELATED TO FEE PETITION.
5/20/2024	JOSEPH VANCE	1.50	757.50	ANALYZE ISSUES RELATED TO PREJUDGMENT INTEREST.
5/20/2024	JOSEPH VANCE	0.20	101.00	TELEPHONE CONFERENCE WITH BRAD SMITH RE: STRATEGY.
5/21/2024	JASON M ROSENBAUM	6.00	1,950.00	DRAFT MOTION AND DECLARATIONS TO AMEND JUDGMENT TO INCLUDE TREBLE DAMAGES AND PREJUDGMENT INTEREST, AND FOR AN AWARD OF ATTORNEYS' FEES AND NONTAXABLE COSTS.
5/21/2024	NICHOLAS F CODY	0.90	337.50	INITIAL REVIEW OF FEE ITEMIZATION FROM TREJO LITIGATION (.7); CORRESPONDENCE WITH ATTORNEY STOUMBOS REGARDING SAME (.2).
5/21/2024	JOSEPH VANCE	0.80	404.00	ANALYZE LEGAL ISSUES FOR FEE PETITION.
5/21/2024	JOSEPH VANCE	0.80	404.00	ANALYZE INFORMATION FOR FEE PETITION.
5/22/2024	JASON M ROSENBAUM	3.00	975.00	DRAFT MOTION TO AMEND JUDGMENT AND FOR ATTORNEYS' FEES.
5/22/2024	NICHOLAS F CODY	0.20	75.00	TELEPHONE CALL WITH ATTORNEY VANCE REGARDING ATTORNEY FEE PETITION.
5/22/2024	COLLINGER A JOHNSON	0.20	25.00	WORK ON COMPILING INVOICES FOR FEE PETITION.

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5/22/2024	JOSEPH VANCE	1.30	656.50	REVIEW AND COMMENT ON DRAFT PETITION.
5/23/2024	JASON M ROSENBAUM	5.50	1,787.50	DRAFT MOTION AND DECLARATIONS TO AMEND JUDGMENT AND FOR ATTORNEYS' FEES AND NONTAXABLE COSTS.
5/23/2024	NICHOLAS F CODY	0.80	300.00	COMPLETE SUMMARY OF ATTORNEY SMITH'S TIME FOR PRESENTATION IN FEE PETITION.
5/23/2024	NICHOLAS F CODY	2.40	900.00	INITIAL REVIEW AND REVISIONS TO MOTION FOR ATTORNEY FEES AND PREJUDGMENT INTEREST (2.2); CORRESPONDENCE WITH ATTORNEY ROSENBAUM REGARDING SAME (.2).
5/23/2024	JOSEPH VANCE	0.70	353.50	REVIEW AND COMMENT ON DRAFT PLEADINGS FOR FEE PETITION.
5/24/2024	JASON M ROSENBAUM	3.00	975.00	REVIEW AND REVISE ATTORNEY BILLING STATEMENTS FOR PRIVILEGE.
5/24/2024	JASON M ROSENBAUM	2.00	650.00	DRAFT/REVISE MOTION FOR ATTORNEY FEES.
5/24/2024	PHILLIP J HABERTHUR	0.30	142.50	TELEPHONE CALL WITH NICK CODY REGARDING FEE APPLICATION ISSUES.
5/24/2024	NICHOLAS F CODY	0.90	337.50	CONTINUE COMPILATION OF FEE AND COST SUMMARY FOR FEE PETITION (.7); CORRESPONDENCE WITH ATTORNEY ROSENBAUM REGARDING REVISION OF SAME FOR ATTORNEY-CLIENT PRIVILEGE (.2).
5/24/2024	COLLINGER A JOHNSON	1.20	150.00	PREPARE SPREADSHEET OF COSTS INCURRED BY CLIENT THROUGH TRIAL.
5/24/2024	JOSEPH VANCE	0.50	252.50	REVIEW AND COMMENT ON DRAFT PLEADINGS FOR FEE PETITION.
5/27/2024	JASON M ROSENBAUM	1.50	487.50	DRAFT DECLARATIONS IN SUPPORT OF MOTION FOR ATTORNEY FEES AND COSTS.
5/28/2024	NICHOLAS F CODY	3.10	1,162.50	REVIEW AND REVISE FEE ITEMIZATIONS TO OMIT PRIVILEGED INFORMATION.

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DATE	NAME	HOURS	AMOUNT	DESCRIPTION
5/28/2024	NICHOLAS F CODY	1.60	600.00	TELEPHONE CALL WITH ATTORNEY VANCE REGARDING MOTION FOR ATTORNEY FEES [.2]; REVIEW AND REVISE SAME AND SUPPORTING DECLARATIONS [.1.4].
5/28/2024	NICHOLAS F CODY	6.40	2,400.00	REVIEW AND REVISE MOTION FOR PREJUDGMENT INTEREST, STATUTORY DAMAGES, COSTS AND FEES AND SUPPORTING DECLARATIONS OF COUNSEL AND RETIRED JUSTICE TALMADGE [5.5]; REVIEW AND BEGIN FINALIZING SUPPORTING FEE ITEMIZATIONS [.7]; CORRESPONDENCE WITH ATTORNEY VANCE REGARDING SAME [.2].
5/28/2024	JOSEPH VANCE	1.50	757.50	REVIEW AND COMMENT ON DRAFT FEE PETITION PLEADINGS.
5/29/2024	NICHOLAS F CODY	3.10	1,162.50	COMPLETE REVIEW OF FEE ITEMIZATIONS AND REVISIONS TO SAME TO OMIT PRIVILEGED INFORMATION [2.2]; REVIEW AND REVISE COST ITEMIZATION [.4]; REVIEW AND REVISE FEE PETITION [.5].
5/29/2024	NICHOLAS F CODY	0.60	225.00	TELEPHONE CALL WITH ATTORNEY HABERTHUR REGARDING FEE PETITION.
5/29/2024	JASON M ROSENBAUM	2.70	877.50	REVIEW AND ANALYZE BILLING ENTRIES IN CONNECTION WITH ATTORNEY FEES MOTION.
5/29/2024	PHILLIP J HABERTHUR	0.80	380.00	REVIEW FEE STATEMENTS OF ETTER MCMAHON AND FELTMAN EWING FOR INCLUSION IN ATTORNEY FEE PETITION.
5/29/2024	PHILLIP J HABERTHUR	2.40	1,140.00	REVIEW AND REVISE LANDERHOLM TIME ENTRIES FOR ATTORNEY FEE PETITION.
5/29/2024	PHILLIP J HABERTHUR	0.60	285.00	TELEPHONE CALL WITH NICK CODY REGARDING ATTORNEY FEE PETITION.
5/29/2024	COLLINGER A JOHNSON	1.30	162.50	REVISE AND UPDATE SPREADSHEET OF COSTS INCURRED BY LANDERHOLM THROUGH TRIAL.
5/30/2024	NICHOLAS F CODY	4.10	1,537.50	COMPLETE REVIEW AND REVISIONS TO MOTION FOR PREJUDGMENT INTEREST, STATUTORY

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**LANDERHOLM**

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805 Broadway Street
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Vancouver, WA 98666T: (360) 696-3312
T: (503) 283-3393
F: (360) 816-2521
www.landerholm.com**STATEMENT**

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	NAME	HOURS	AMOUNT	DESCRIPTION
				DAMAGES, AND ATTORNEY FEES [2.2]; REVIEW AND REVISE ALL SUPPORTING DECLARATION ATTACHING FEE ITEMIZATIONS [1.1]; COORDINATE WITH STAFF TO COMPILE AND MARK EXHIBITS AND PREPARE SUBMISSIONS FOR FILING [.8].
TOTAL		858.70	268,141.50	

-----TIME AND FEE SUMMARY-----

-----TIMEKEEPER-----	HOURS	FEES
AMANDA P BEATSON	10.50	1,393.00
BRADLEY W. ANDERSEN	208.60	63,684.50
CLAIRE L ROOTJES	12.90	3,805.50
COLLINGER A JOHNSON	27.70	3,162.50
CURTIS J CHRISTENSEN	86.80	14,526.00
HEATHER A DUMONT	2.00	0.00
JASON M ROSENBAUM	210.10	63,112.50
JOSEPH VANCE	170.10	85,900.50
MONICA M RECH	6.10	95.00
NICHOLAS F CODY	69.90	17,850.00
PHILLIP J HABERTHUR	9.00	4,073.00
PRECIOUS M MILLER	16.40	689.00
R. BRYCE SINER	4.00	1,240.00
ZACHARY H. STOUMBOS	24.60	8,610.00
GRAND TOTAL	858.70	\$268,141.50

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STATEMENT

DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

COSTS ADVANCED:

DATE	DESCRIPTION	AMOUNT
5/1/2019	Administrative Fee	20.00
11/5/2019	Postage	17.40
5/22/2020	Telephone Charges - - Vendor: Century Link	2.30
1/21/2021	Telephone Charges - - Vendor: Century Link	17.13
7/7/2021	Deposition of Peggy Foraker - AVIS Rental Car	614.41
7/7/2021	Deposition of Peggy Foraker - United Airlines Inflight	9.99
7/7/2021	Deposition of Peggy Foraker - United Airlines Inflight	13.99
7/7/2021	Deposition of Peggy Foraker - United Airlines Flight	1,274.64
7/7/2021	Deposition of Peggy Foraker - Meal	16.67
7/7/2021	Deposition of Peggy Foraker - Chandler + Halasz Court Reporter	390.00
7/7/2021	Deposition of Peggy Foraker - Meal	17.90
7/7/2021	Deposition of Peggy Foraker - Best Western Hotel	248.52
7/7/2021	Deposition of Peggy Foraker - Meal	12.85
7/7/2021	Deposition of Peggy Foraker - Meal	40.22
5/16/2022	Mileage, Parking & Travel - - Vendor: Star Park, LLC	50.00
5/16/2022	Mileage, Parking & Travel	63.64
7/12/2022	Document Fee - Transcript Fee - - Vendor: Pacer Service Center	26.30
4/4/2024	Deposition Fee	240.00
4/19/2024	Lexbe Inc - Document Review/Hosting Fees	179.03
5/14/2024	Lexbe Inc - Document Review/Hosting Fees	179.03
5/9/2024	Realtime Transcript of Dale Anderson	141.00
5/16/2024	Puget Sound Claim Consulting - Expert Danette K. Leonhardi	5,325.00
4/30/2024	Xpress Legal Invoice 43721	366.55

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STATEMENT

DALE E. ANDERSON

INVOICE DATE:	MAY 30, 2024
INVOICE NUM.:	XXXXXX
MATTER NUMBER:	ANDD02-000037

DATE	DESCRIPTION	AMOUNT
5/21/2024	Process Service Fee - - Vendor: Xpress Legal Support, LLC	366.55
5/21/2024	Process Service Fee - - Vendor: Xpress Legal Support, LLC	287.60
5/12/2024	Hotel during trial -- Joseph Vance Part 1	1,079.90
5/15/2024	Hotel during trial -- Joseph Vance Part 2	1,053.62
5/7/2024	Conference Room Reservation Deposit	3,772.26
5/3/2024	Conference Room Remaining Payment	628.71
5/16/2024	Conference Room Supplemental Visa Payment	0.07
5/23/2024	Vance Meal - Trial	46.86
5/21/2024	Vance Mileage - Pretrial Conference	81.07
5/21/2024	Vance Mileage - Pretrial Conference Return	81.07
5/21/2024	Vance Mileage - Trial Part 1	81.07
5/21/2024	Vance Mileage - Trial Part 1 Return	81.07
5/21/2024	Vance Mileage - Trial Part 2	81.07
5/21/2024	Vance Parking - Pretrial Conference	6.00
5/21/2024	Vance Mileage - Trial Part 2 Return	81.07
5/23/2024	Rosenbaum Mileage - Pretrial Tech Meeting	89.78
5/23/2024	Rosenbaum Mileage - Pretrial Tech Meeting Return	89.78
5/23/2024	Rosenbaum Mileage - Trial Part 1	89.78
5/23/2024	Rosenbaum Mileage - Trial Part 1 Return	89.78
5/29/2024	Rosenbaum Mileage - Trial Part 2	89.78
5/29/2024	Rosenbaum Mileage - Trial Part 2 Return	89.78
5/8/2024	Hotel during trial -- Jason Rosenbaum Part 1	1,044.97
5/14/2024	Hotel during trial -- Jason Rosenbaum Part 2	626.97
5/15/2024	Hotel during trial -- Jason Rosenbaum La Quinta	238.92

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EXHIBIT A
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DALE E. ANDERSON

INVOICE DATE: MAY 30, 2024

INVOICE NUM.: XXXXXX

MATTER NUMBER: ANDD02-000037

DATE	DESCRIPTION	AMOUNT
5/15/2024	Courtyard by Marriott	\$3.75
5/15/2024	Jimmy John's	\$34.95
5/14/2024	Courtyard by Marriott	\$19.65
5/14/2024	Jimmy John's	\$34.95
5/13/2024	Camp Colvos Brewing + Pizza	\$21.50
5/13/2024	Jimmy John's	\$46.84
5/7/2024	Courtyard by Marriott	\$3.75
5/7/2024	Courtyard by Marriott	\$16.00
5/6/2024	Courtyard by Marriott	\$3.75
5/6/2024	Courtyard by Marriott	\$22.00
5/6/2024	Tim's Kitchen Tacoma	\$25.00
5/6/2024	Jimmy John's	\$63.34
5/3/2024	Tacoma City Parking	\$1.00
5/3/2024	Tacoma City Parking	\$1.50
5/2/2024	Tacoma City Parking	\$1.50
Total		\$19,743.58

TOTAL COSTS ADVANCED THIS INVOICE \$19,743.58

TOTAL FEES THIS INVOICE \$268,141.50

TOTAL AMOUNT DUE **\$287,885.08**

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